EPA Region 10
PCB Compliance Inspection Report

Inspection Information

Facility Name: Rainier Commons, LLC

EPA ID Number: WAD051230004

Inspection Date: March 24, 2009

Inspection Type: 6PF / NSR - US

Inspection Team: Bruce Long, USEPA Oregon Operations Office, Office of Compliance and Enforcement, Inspection and Enforcement Management Unit; 503-326-3686. long.bruce@epa.gov. Tristen S. Gardner, Pesticides and Toxics Unit. 206.553.6240. gardner.tristen@epa.gov.

Site Contact Information

Contact Name/Title: Mr. Eitan Alon, Property Manager; Ariel Development, LLC

Location Address: 3100 Airport Way South, Seattle, Washington 98134

Latitude: 47.576224 **Longitudes**: -122.321200

Mailing Address: 1425 5th Avenue, Suite 2625, Seattle, Washington 98027

Phone Number: 206-447-0263 x203
206-898-8561

Fax Number: 206-447-0299

Report Information

Report Start Date: March 24, 2009 **Date Report Completed:** April 16, 2009

Report Author Name: Bruce Long

Report Author Signature: Bruce Long

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Attachments

General Facility Information

The Rainer Commons, located in the Georgetown District of South Seattle, is the former Rainier Brewery Building which was first built in 1884. The Old Brewery is an approximately 4.57 acre parcel with 26 buildings located at 3100 Airport Way South, Seattle, Washington. The Brewery is bound by South Stevens Street to the north, by South Horton Street to the south, by Interstate 5 to the east and Airport Way to the west (Maps, Page 1). The property was purchased by Rainier Commons, LLC in August 2003 from the Benavoya Foundation (Attachment III, Page I). The properties current use is a coffee roasting and storage facility, artist loft (Music and other arts), and two restaurants.

The Rainier Commons is owned by the Rainier Commons, LLC, but is managed by Ariel Development, LLC. There are common members in both organizations (Attachment III).

Facility NAISC No: 445290 and 721310

Current Site Contact Information: Rainier Commons, LLC

Contact Name/Title: Mr. Brett Goldfarb, Member
Mailing Address: 14255 5th Avenue, Suite 2625, Seattle, Washington 98027
Phone Number: 503-829-7200
Fax Number: 503-829-7320

Current Site Contact Information: Ariel Development, LLC

Contact Name/Title: Mr. Eitan Alon, Property Manager
Mailing Address: 3317 3rd Avenue South, Seattle, Washington 98134
Phone Number: 206-447-0263 x203
Fax Number: 206-447-0299

Current Environmental Contractor: Camp Dresser and McKee, Inc., (CDM)

Contact Name/Title: Ms. Pamela J. Morrill, LHG
Mailing Address: 11811 N.E. 1st Street, Suite 201, Bellevue, Washington 98005
Phone Number: 425-453-8383
Fax Number: 425-646-9523

Facility History

The Rainier Brewery operated at the Airport Way location from 1883 to 1999. In 1999, the property was purchased by Benaroya Foundation and then sold to Rainier Commons, LLC in August 2003[1]. The surrounding properties are small manufacturing facilities and retail stores. There is residential property to the east on the east side of Interstate 5.

In October 2005, the City of Seattle Public Utility Department (SUP) did a survey of the storm water collection system around the old brewery and found PCBs in the system that ranged from 17,500 mg/kg (ppm) to 2,200,000 mg/kg (Attachment VI). The same locations were resampled in January 2008 and the concentrations dropped by a factor of 100. In February 2008, the SPU scoured the storm water collection system around the Old Brewery and removed the PCB sediments in the storm water collection system.

It was reported by Vernon Environmental, Inc. in a report titled, Catch Basin Stormwater Field Sample Results, dated September 8, 2008, that there were six transformer vaults at the old brewery. However, the report does not identify the location of these transformer vaults and does not list the type of transformers that were in use at the time of the survey. A supplemental map was prepared by City of Seattle Public Utility Department (SUP) that shows the location of former transformers at the old brewery (Attachment I, Page 4). In a report by Farallon Consulting, Phase I – Environmental Assessment, dated April 14, 2004, Farallon states that nine transformers were found at the old Rainier facility, but all were non-PCB. The Seattle City Light owned three of the nine transformers and reported to Farallon that they were tested and found to be non-PCB transformers. The City transformers are located in a substation in front of Building 9.

In May 2006, Rainier Commons, through its consultant Vernon Environmental, Inc. (VEI) conducted a joint investigation of the storm water collection system and out of curiosity sampled the paint of the old brewery's exterior to see if it was the source of PCBs that were ending up in the storm water collection system[2]. In the VEI report the PCB concentration in the paint sample was 2,300 mg/kg (ppm) and is reported as Aroclor 1254. The City of Seattle Public Utility Department (SUP) found Aroclor 1254 in its samples of sediments collected in the storm water collection system in October 2005 and January 2008.

Other media information:

This facility is subject to regulation administered by the King County under the Clean Water Act (Storm Water Management). The facility has a Resource Conservation and Recovery Act identification assigned; WAD051230004.

TSCA Section 6(e) Notification:

As of the date of this inspection and investigation, there was no notification to EPA regarding the facilities management of PCBs and PCB remediation waste. Rainer Commons has not notified EPA of any PCB handling activities it may take to remediate the PCB waste in the storm water collection system.

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[1] Site history from Farallon Consulting, Inc., Site Assessment Report, Aril 14, 2004.
[2] Catch Basin Sediment Sample Results Report. Vernon Environmental, Inc. June 2006, Page 5.

Access:

The Rainier Commons is managed by Ariel Development, LLC. To gain access to portions of the facility, permission can be granted by members of the Ariel Development organization. There are public businesses operating at the facility, those businesses, open to the public, can be accessed during business hours.

Contact Information for Ariel Development, LLC:
Contact Name/Title: Mr. Eitan Alon, Property Manager
Mailing Address: 3317 3rd Avenue South, Seattle, Washington 98134
Phone Number: 206-447-0263 x203
Fax Number: 206-447-0299

Facility Map:

Maps and aerial photographs are under the Attachment I.

Weather:

The weather at the time of this inspection was cloudy with rain and showers off and on throughout the day. Rainfall within the previous 24-hours was approximately 0.04 inches[3].

[3] Weather Report posted by NOAA, www.NOAA.gov/sew

Description of PCB Inspection

The United States Environmental Protection Agency (EPA) intended to secure information regarding Rainier Commons, LLC's compliance with the regulations promulgated under Section 6(e) of the Toxic Substance and Control Act (TSCA). Specifically, compliance with the regulations found at 40 CFR Part 761 for the management, distribution in commerce, use, disposal, storage, and marking of PCBs and PCB items. This inspection was conducted under the authority of Section 11 of TSCA (Attachment II). This was an announced inspection.

At approximately 1:00 pm on March 24, 2009, Mr. Tristen Gardner and I arrived at the Tully's Coffee Shop located in the northwest corner of the old Rainer Brewery. Shortly after our arrival we met with Mr. Eitan Alon, Property Manger for Ariel Development, LLC, Mr. Seth Von Wald, Ariel Development and Ms. Pamela J. Morrill, consultant to Rainier Commons (CDM). Mr. Eitan Alon said he was an employee of Ariel Development, but he was there as a representative for Rainier Commons, LLC. After introductions, I presented my credentials and the Notice of Inspection (Attachment II). I reviewed the scope of this inspection with Mr. Alon and the other representatives.

We began the inspection by walking through the old brewery. Using the map provided by the City of Seattle Public Utility Department (SUP) we went to each of the locations where a transformer was believed to have been in place either in the past or currently (Attachment I, Page 4). There are two locations that we could not get access. The electrical panel seen in Photograph 6 from the Farallon Phase I Environmental Assessment Report, April 2004, is actually located inside Building No. 9. Building 9 is leased by Tully's Coffee and Tea (Tully's) and their people were not available to give us access to the room. The second location is also leased by Tully's. This is Building 20. Mr. Alon agreed to gain access to these two locations and would notify EPA when we could return and inspect the electrical panel in Building 9. Mr. Alon said to me that there was no transformer in Building 20, but EPA could inspect when Tully's granted access.

In Building 5 on the fourth floor (Noted as Floor 400) was a raised concrete pad, which is believed to be a former location for a transformer (Photograph No. P1000860). The materials stored on the pad were removed and I saw no sign of oil stains or any decolonization to the concrete. Mr. Alon said to me, the transformer had to have been removed long before Rainier Commons purchased the property.

There were some electrical switches and a fuse box on the wall in Building 5 (Photograph No. P1000862 and P1000864). These articles were not oil filled and there was no leaking potting compound from these articles.

The elevator in Building 5 is the only remaining elevator from the old brewery. On the roof of Building 5 is a small room that houses the pulley and cable along with the electrical motor and gearbox (Photograph No. P1000865 and P1000866). The gearbox is oil filled and was leaking (Photograph No. P1000866). I took a sample of the oil to be analyzed for PCBs. Table I summarizes the PCB results for the oil leaking from the elevator gearbox. In addition to the PCBs in the gear oil, Chlordane was also detected in the oil (Attachment IV).

Table I – PCB Results for Oil from the Elevator Gearbox – 3/24/2009

EPA Sample No.	Location of Sample	Aroclor	Aroclor	Results in µg/kg
09124300	Gear Oil	1254		8.9

In Building 6 on floor 5 (floor 500), I could not locate an area where a transformer could have been placed into use. This room was the former hops storage. In the past, the room was filled with tanks, but now the room is empty. I walked the entire area and saw no sign of a transformer or a place were a transformer was previously in place. At the time of this inspection, the room was completely empty.

In Building 25 on the third floor is a restaurant and bar. The corner where a former transformer was in use is now a bar and the location of a refrigerator used to store beer (Photograph No. P1000868).

The Seattle City Light Sub-Station

Exterior Paint on the old brewery was first tested by Rainier Commons' consultant in May 2006[4]. There is very little detail about the sampling event and no quality assurance data for the sample results. The table that appears in the Vernon Environmental report simply reported the exterior paint as 2,300 mg/kg Aroclor 1254.

During this inspection, I collected paint samples from the exterior wall of Building 13. This wall faces west and parallel with Airport Way. I also gathered paint chips that had accumulated in a gravel strip between Building 13 and the parking lot. This second sample also includes paint chips that had migrated to the edge of Catch Basin 2 (Attachment I, Page 5). Table II summaries the PCB results for the two Paint chip samples I collected on March 24, 2009.

Table II – PCB Results for Exterior Paint on Rainier Commons

EPA Sample No.	Location of Sample	Aroclor	Aroclor	Results in mg/kg
09124301	Wall – Building 13	1254	1260	700
09124302	Ground samples	1254	1260	10, 000

See Attachment IV

Mr. Alon said to me that his company had cleaned the building in 2005 and painted over the PCB paint to try and encapsulate it. Mr. Alon said his company is planning to do a cleaning of the exterior walls later this year (2009) and try to encapsulate the PCB paint to prevent it from continuing to peal off the building. I advised Mr. Alon that before he did this, he would need to contact EPA for approval. Rainier Commons has known about the PCBs in the paint following the sampling in May 2006.

I collected a sample from a storm water drain in the Breezeway Courtyard between Building 13 and Building 3. This is the location of Storm water Drain SD1. Sample number 09124303 is from the sediment trapped in the channel. The PCBs found in the sediment sample are approximately 105 mg/kg (ppm) (Attachment IV).

[4] Catch Basin Sediment Sample Results Report. Vernon Environmental, Inc. June 2006, Page 5.

Annual Documents:

Rainier Commons has not notified EPA using form 7710-53 to report its generation of PCB remediation waste for the removal of PCB contaminated sediment from the storm water collection system around the Old Brewery or removal of paint from the building. Records of the removal and disposal of remediation waste removed in 2005 from the storm water collection system were not available to EPA at the time of this inspection.

Manifest Review:

Mr. Alon said to me, there is no manifested remediation waste by Rainier Commons, including the disposal of sediments removed from the storm water collection system in 2005.

Out Brief:

I discussed the following with Mr. Alon, Ms. Morrill, and Mr. Von Wald.

1 – Before Rainer Commons washes down the building and removes any of the PCB containing paint, they must notify EPA at least 30 days prior to the start of the remediation.
2 – EPA still needs to see what is on the inside of the electrical panel in Building No. 9. Mr. Alon agreed to get that arranged within 30 days.

The field portion of this inspection closed at approximately 4:55 pm Pacific Standard Time (PST) on March 24, 2009.

Attachments:

Photograph Log – March 24, 2009
I – Maps; Road Maps to the Facility and Location of Electrical Equipment at the Facility
- Area View ..... Page 1
- Active Brewery (Before 1997) ..... Page 2
- Strom Drain and Combined Sewer ..... Page 3
- Transformer Locations ..... Page 4
- Catch Basin Location ..... Page 5

II – Notice of Inspection – March 24, 2009
III - Business Registration Information
- Rainier Commons, LLC ..... Page 1
- Ariel Development, LLC ..... Page 2

IV – Sample Plan and Sample Results
V – Site Assessment Report 2004 - Photographs
VI – Catch Basin Report 2008
VIII – Catch Basin Report 2009

Photo log 3/24/2009

PHOTO DOCUMENTATION

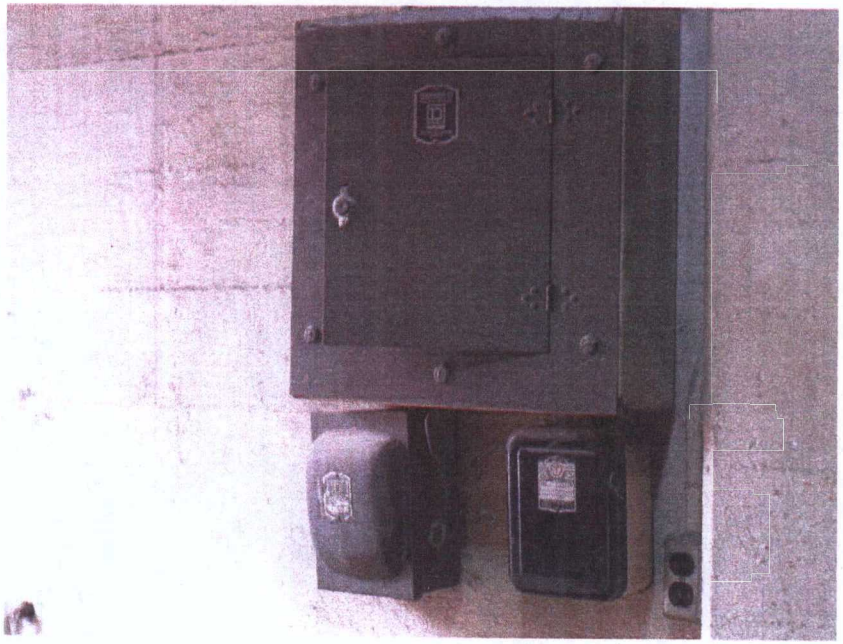
Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long

Description: Former location of a pad mount transformer inside Building 5 on Floor 400. The Farallon Report dated April 2004 stated there were leaking transformers at the Brewery, but did not identify the location of the leaking transformers. There was no visible evidence there had been any leaking transformer oil on this concrete surface.

Time: 1320

Direction: Facing west in Building 5, Floor 400.

Photo No: P1000860



Description: Electrical switches on the wall near the former transformer pad inside Building 5 on Floor 400. All were dry and no visual evidence of leaking oil, present or in the past.

Time: 1320

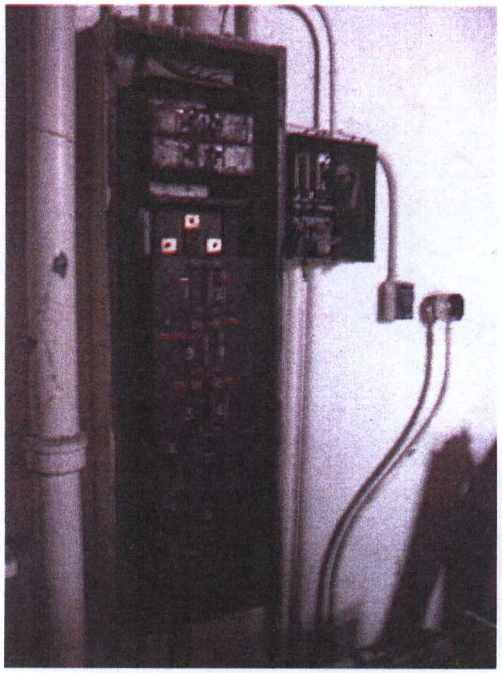
Direction: Facing Northwest, Building 5, Floor 400.

Photo No: P1000862

All times is Pacific Daylight Savings Time.

PHOTO DOCUMENTATION

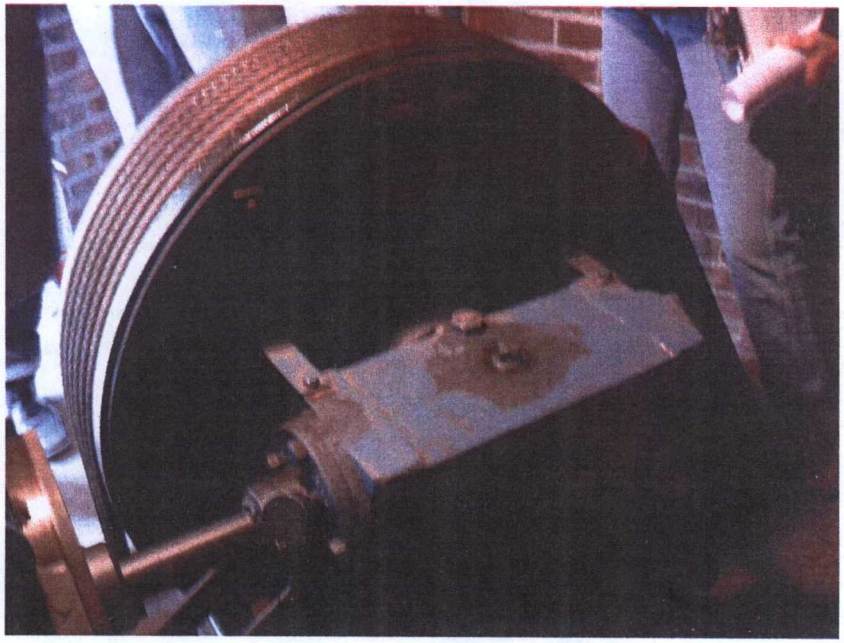
Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long



Description: This is an electrical fuse box located on the south wall inside Building 5 A on the 400 floor. All articles inside the box are made of a potting compound and there is no oil-filled equipment present at the time of this inspection.

Time: 1322 **Direction:** South wall Building 5A.

Photo No: P1000864



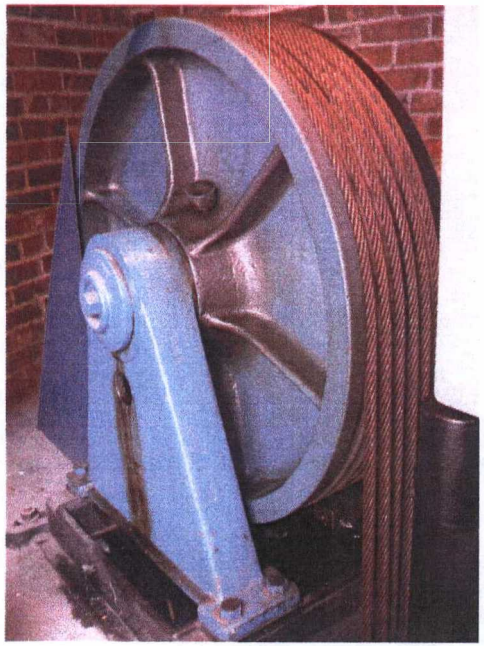
Description: This is the only elevator that remains from the day when the brewery was in operation. The elevator is located on the roof of Building 5. At the time of this inspection, oil was leaking from the gearbox into a drip pan. EPA collected a sample of the oil (Sample No. 09124300).

Time: 1328 **Direction:** Roof of Building 5.

Photo No: P1000865

PHOTO DOCUMENTATION

Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long



Description: There is a drip pan below the cable reel and is the location of the EPA sample 09124300. The oil in the drip pan is leaking onto the floor below the cable reel. The sample results show the presents of chlordane and PCBs.

Time: 1333 **Direction:** Roof of Building 5.

Photo No: P1000866

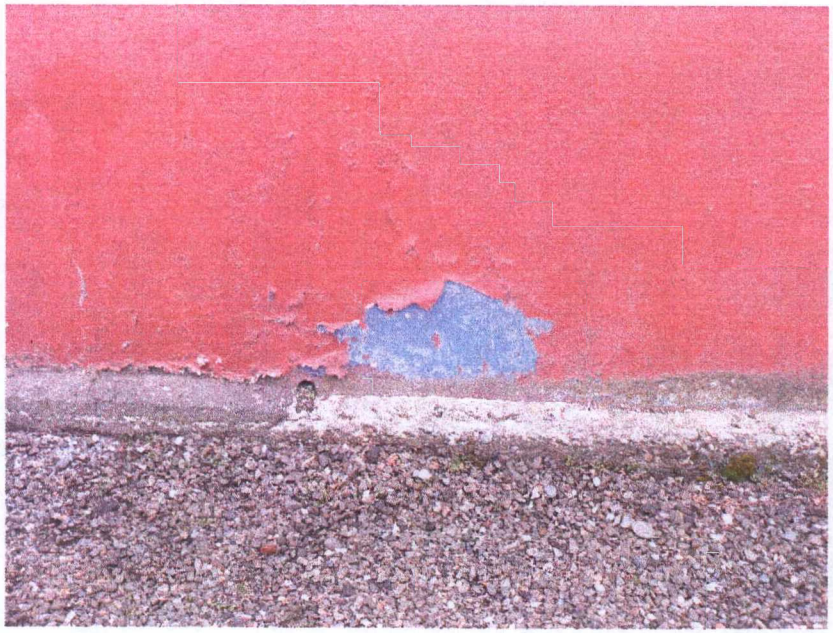
Description: The northwest corner of Building 25 is a food a d drink establishment. The north end of the bar is a former location of a transformer. The floor of the bar has been recovered and the walls painted. There is no sign of past oil leaks from equipment that may have been previously located in the room.

Time: 1420 **Direction:** Northwest corner of the Bar in Building 25, Floor 300.

Photo No: P1000868

PHOTO DOCUMENTATION

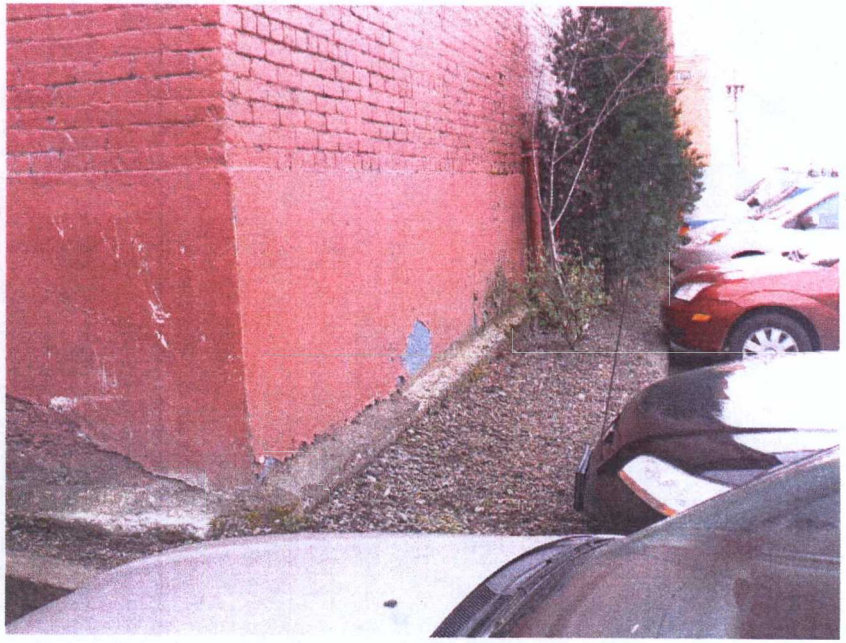
Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long



Description: In the Vernon Environmental Report date June 2006 it was identified to Rainier Commons that the old brewery buildings contained PCBs at concentration greater than 2000 mg/kg. EPA collected a sample of the paint from the west wall of Building 13 (Sample No. 09124301). The results of the analysis shows PCBs in the paint greater than 2000 mg/kg.

Time: 1431 **Direction:** West wall of Building 13.

Photo No: P1000870



Description: The gravel strip in front of the west wall of Building 13 is covered with paint chips that have broken off the buildings surface. Rainier Commons' consultant suspected that during a rain event these paint chips migrate into the catch basins around the building. The west wall of Building 13 is up-hill to Catch Basin 3 and 2 (See Draft Catch Basin Plan).

Time: 1437 **Direction:** West wall of Building 13.

Photo No: P1000873

PHOTO DOCUMENTATION

Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long

Description: The colorful reflection in the gravel strip is paint chips. EPA collected paint chips long the west wall of Building 13. EPA collected paint samples from the paint chips in the gravel strip and in the parking lot leading to the Catch Basins (Sample No. 09124302). The analysis shows PCBs greater than 2000 mg/kg.

Time: 1431 **Direction:** West wall of Building 13.

Photo No: P1000871

Description: This is a typical catch basin cover. In January 2009, Rainier Commons added silt socks to the catch basin. This sock is designed to collect sediment and paint chips that are picked up by the rain. There is a locking device on the metal cover. EPA was not able to unlock the cover for sample collection at this time of this inspection.

Time: 1433 **Direction:** Catch Basin 18 located on the east side of Building 22.

Photo No: P1000869

PHOTO DOCUMENTATION

Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long

Contact Name/Title: Mr. Eitan Alon, Property Manager

Location Address: 3100 Airport Way South, Seattle, Washington 98134

Mailing Address: 1425 5th Avenue, Suite 2625, Seattle, Washington 98027

Phone Number: 206-447-0263 x203

Fax Number: 206-447-0299

1. Photographer: Bruce Long, USEPA Region 10, Oregon Operations
2. Type of Camera Used: Panasonic/Lumix DMC-FZ7
3. Digital recording media: Secure Digital Media
4. All Digital Photos were copied to CD-R media
5. All digital photos were copied to a CD by: Bruce Long

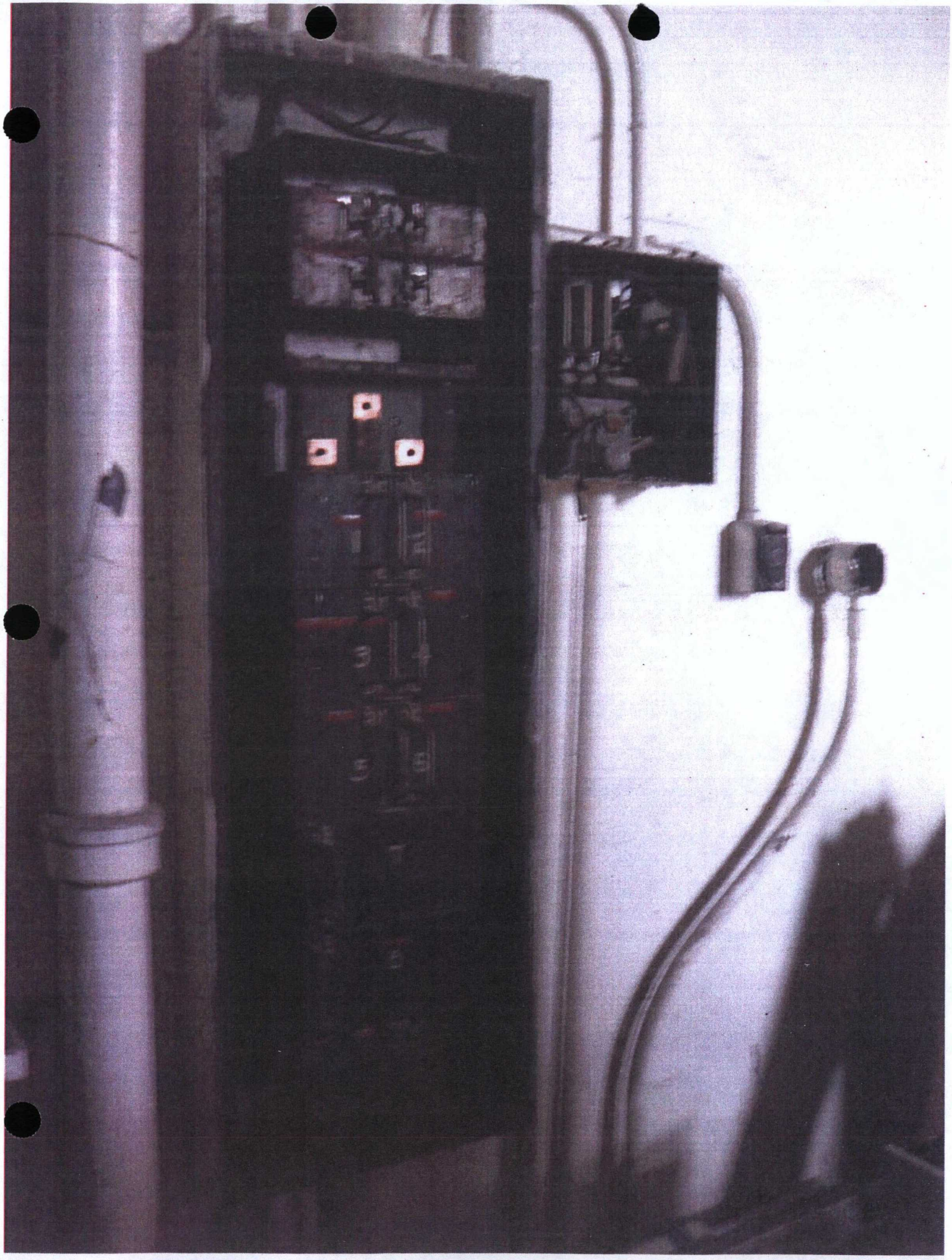
At the conclusion of the inspection, I downloaded the digital photos from the camera to my work PC hard drive. I then grouped the digital images into an electronic folder with the name of the facility. I then recorded the electronic files (digital images) to a CD-R media without any editing. When completed, I then remove the electronic files on the PC. I keep all of the original photographs on the CD-R media so that they cannot be edited or manipulated in any way. I record all of the images taken during the inspection onto the CD-R media even if they were not used as evidence in the report. The camera automatically generates the digital image number sequence. Thus, the numbers assigned to the digital image start were the previous inspection ended. I have not edited or manipulated any of the photographs used in this report.

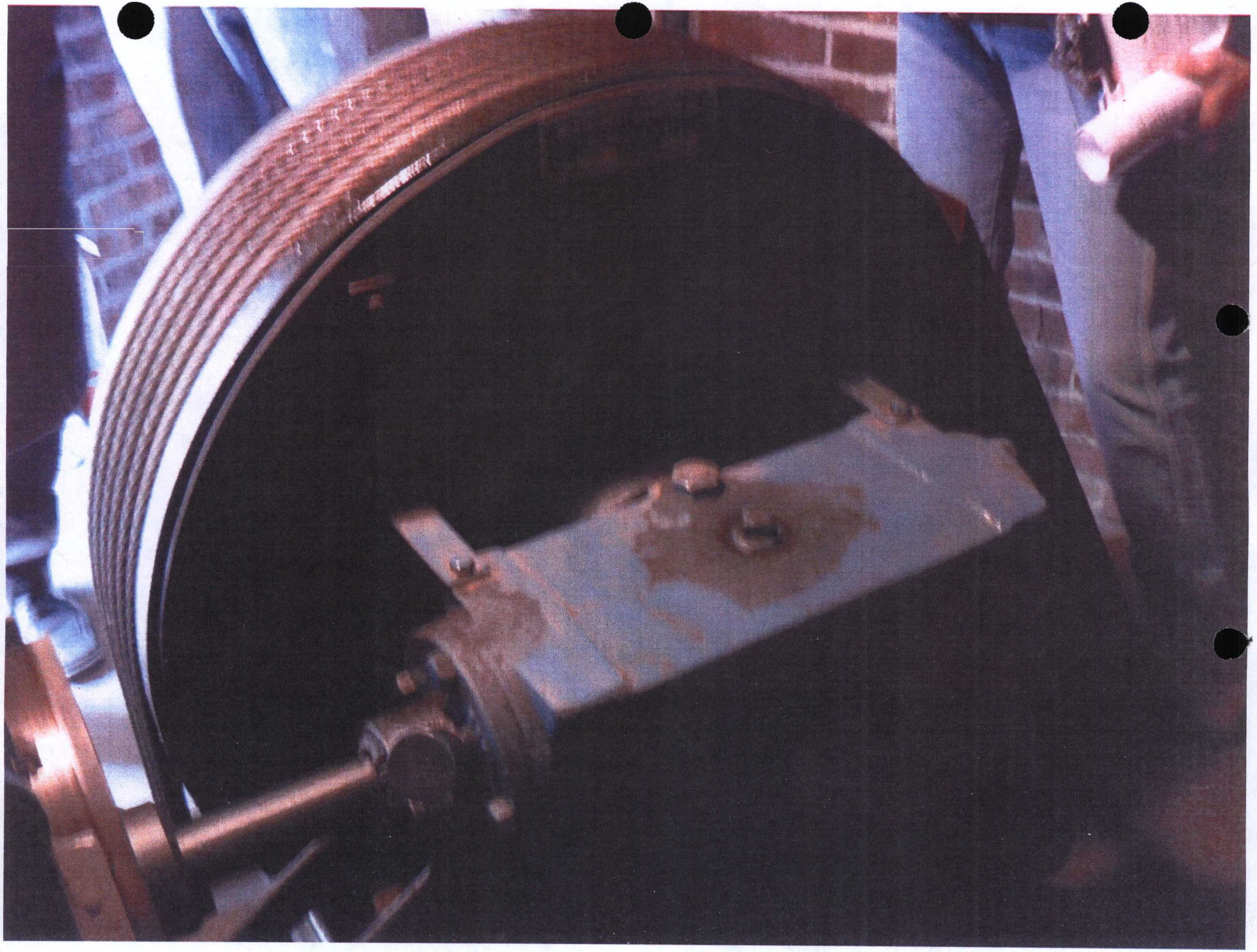
I certify that the above information is true and accurate

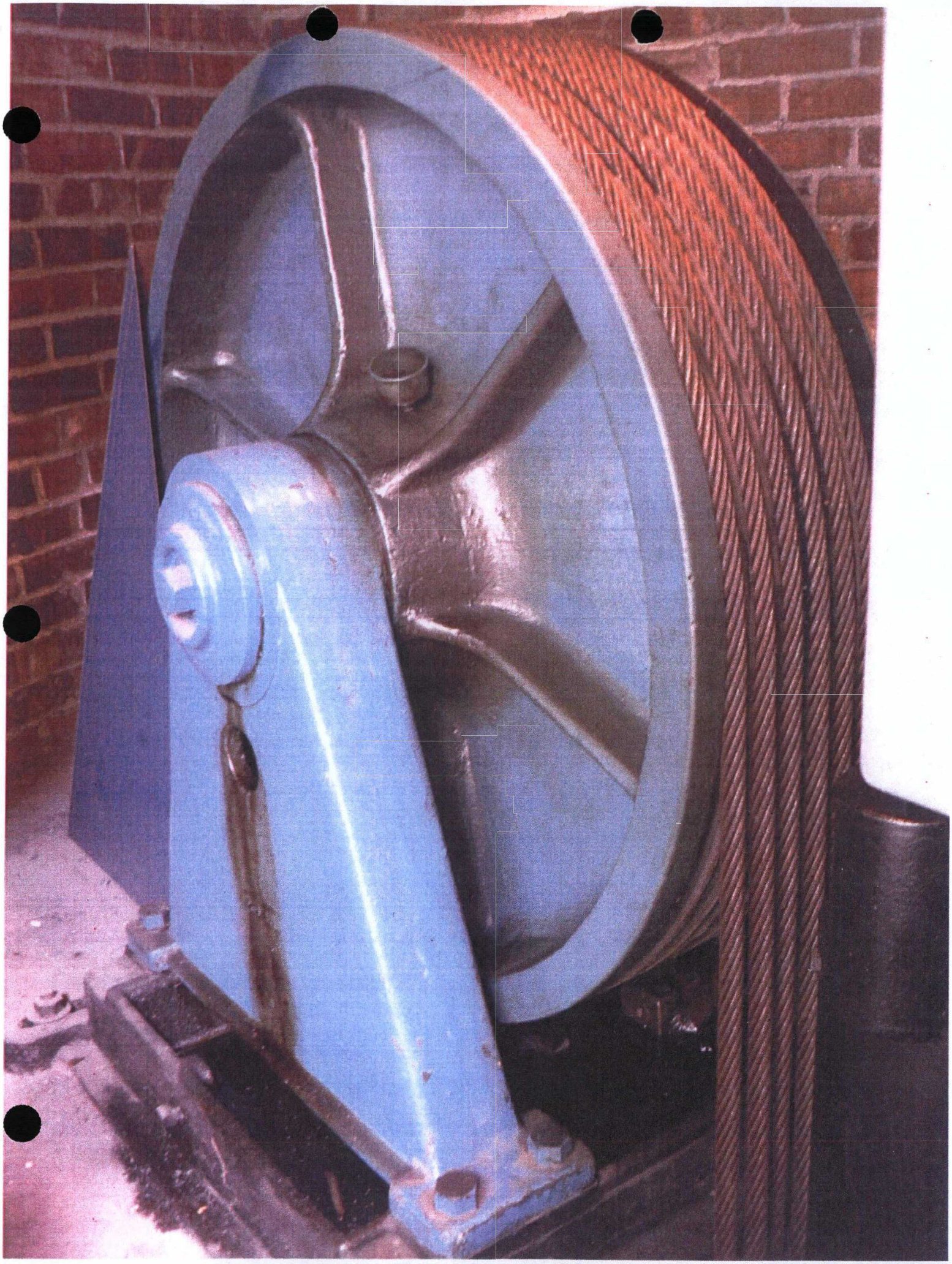
Bruce Long

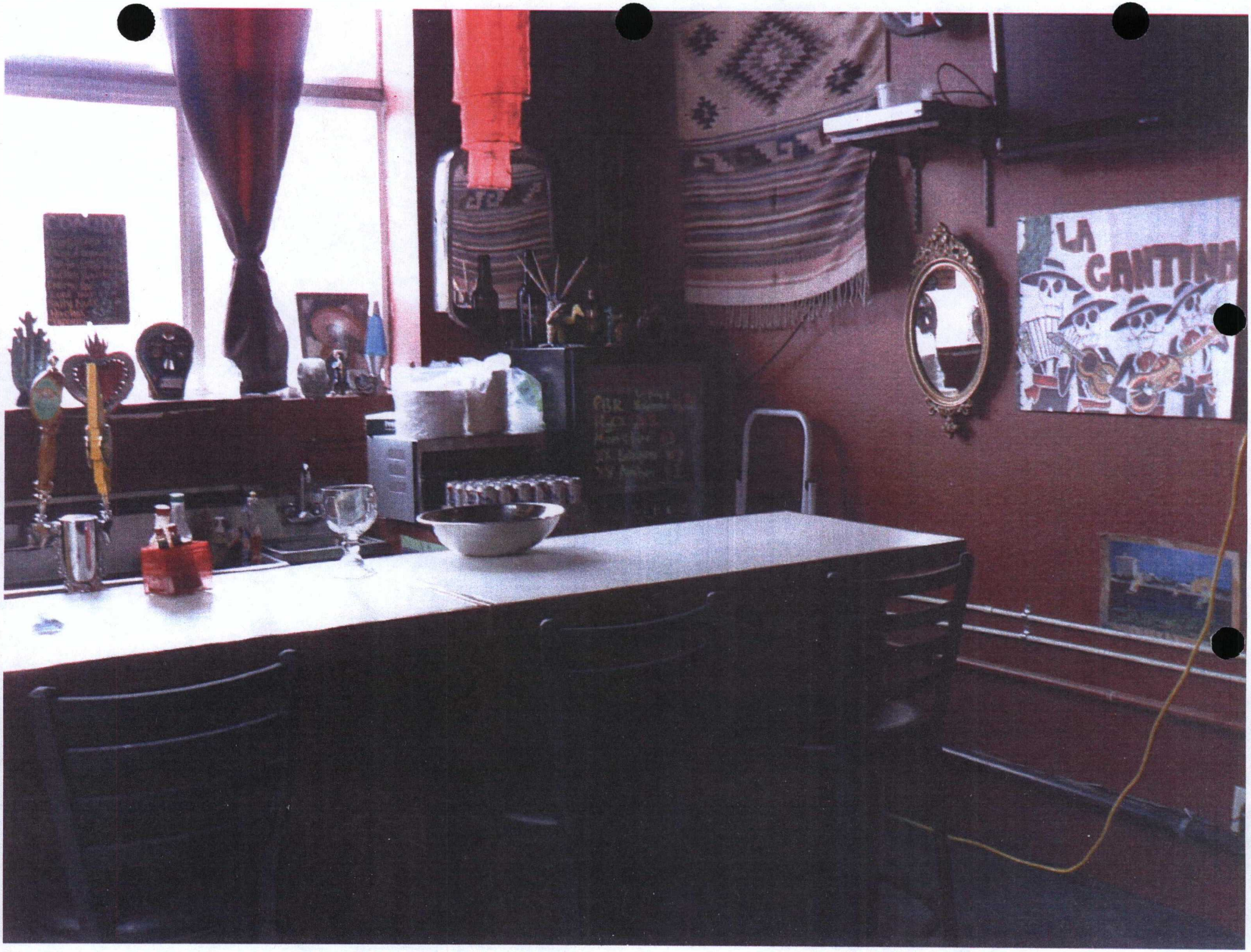
Bruce Long – Mach 24, 2009


R19
JM
R-19
JM








LA CANTINA


LA CANTINA


OUTFALL TO STORMWATER PUMP FOR POLLUTANTS

Rainier Commons, L.L.C.
1425 5th Avenue, Suite 2625
Seattle, Washington 98027

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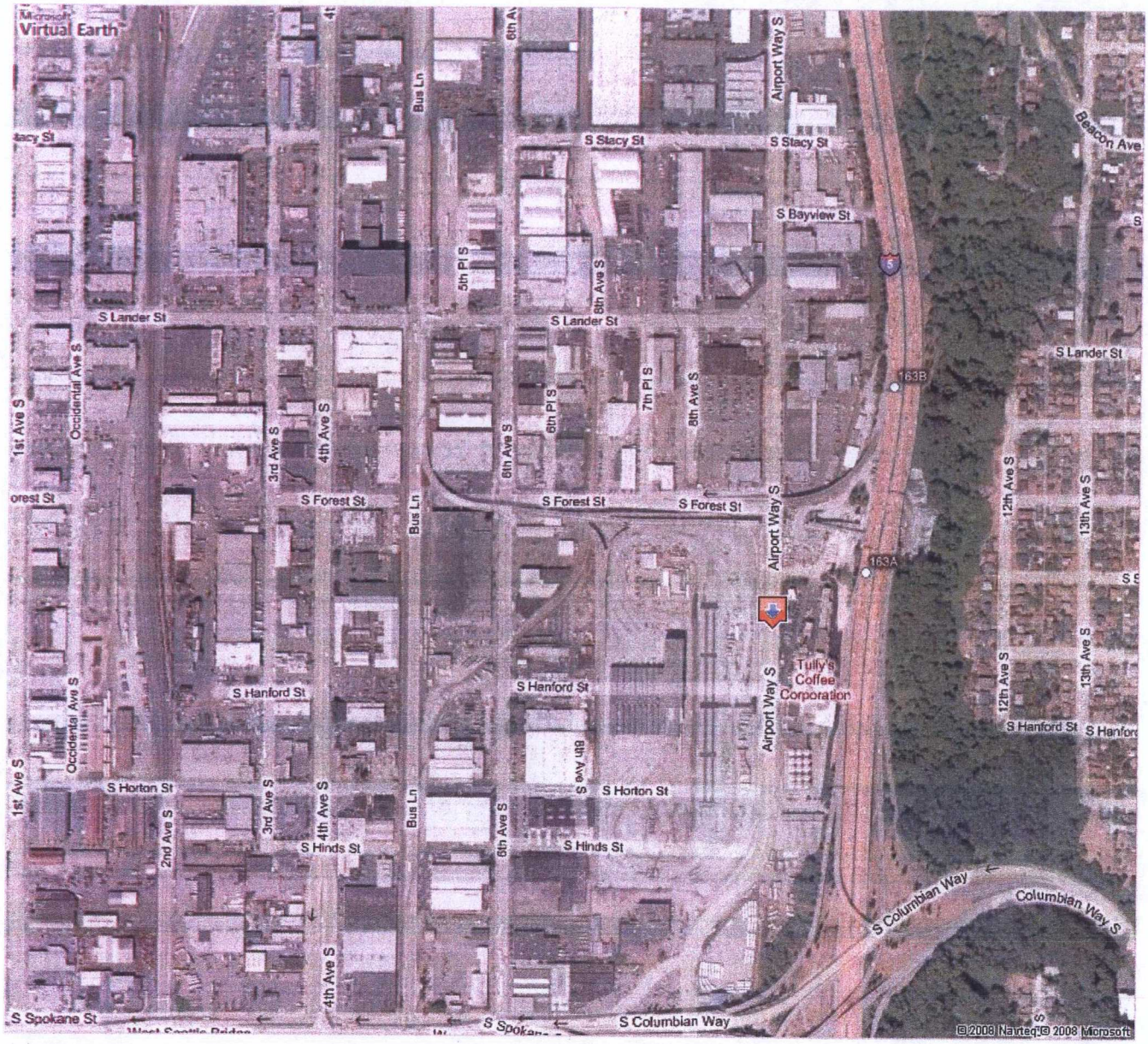
WAD 051239994 - RCRA
1998 - NOV 3/21/98

2001 - Notice the EPA.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Bus Ln
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163B
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Tully's Coffee Corporation
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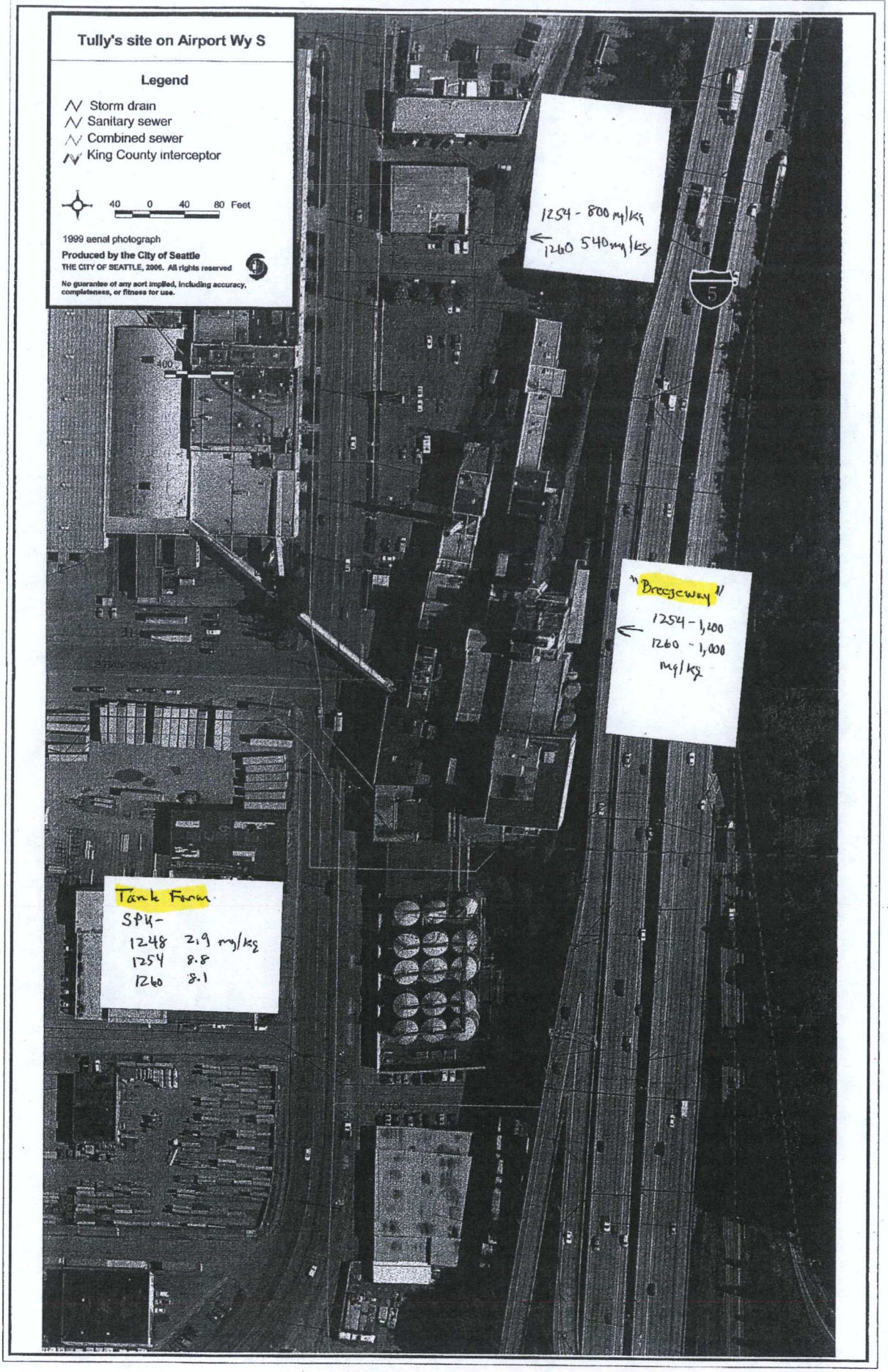
Tully's site on Airport Wy S
Legend
Storm drain
Sanitary sewer
Combined sewer
King County interceptor
40 0 40 80 Feet
1999 aerial photograph
Produced by the City of Seattle
THE CITY OF SEATTLE, 2006. All rights reserved
No guarantee of any sort implied, including accuracy, completeness, or fitness for use.
1254 - 800 mg/kg
1260 540 mg/kg
5
400
"Breezeway"
1254 - 1,200
1260 - 1,000
mg/kg
Tank Farm
SPH-
1248 2.9 mg/kg
1254 8.8
1260 8.1


Tully's site on Airport Wy S
Legend
Storm drain
Sanitary sewer
Combined sewer
King County interceptor
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1999 aerial photograph
Produced by the City of Seattle
THE CITY OF SEATTLE, 2006. All rights reserved
No guarantee of any sort implied, including accuracy, completeness, or fitness for use.
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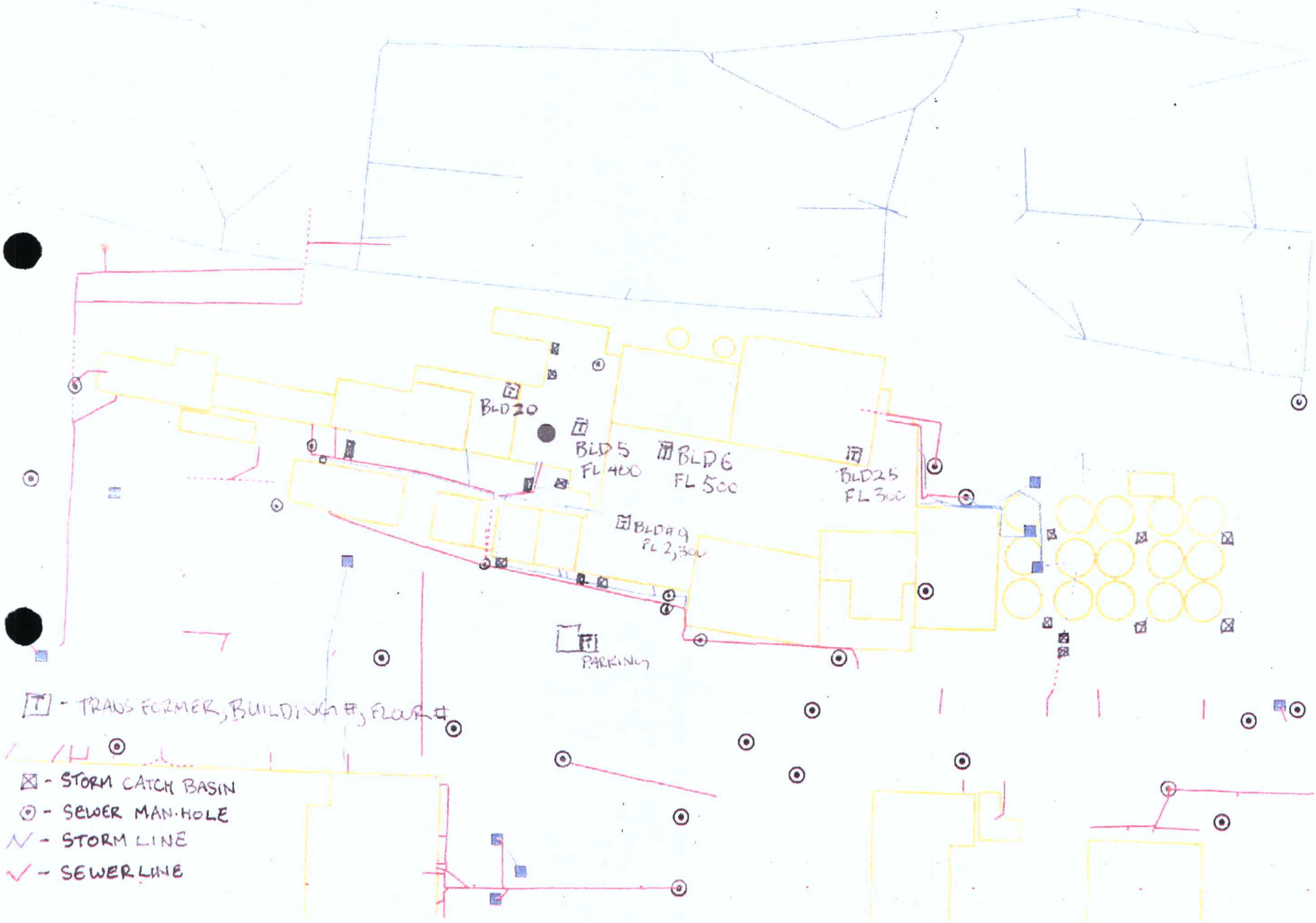
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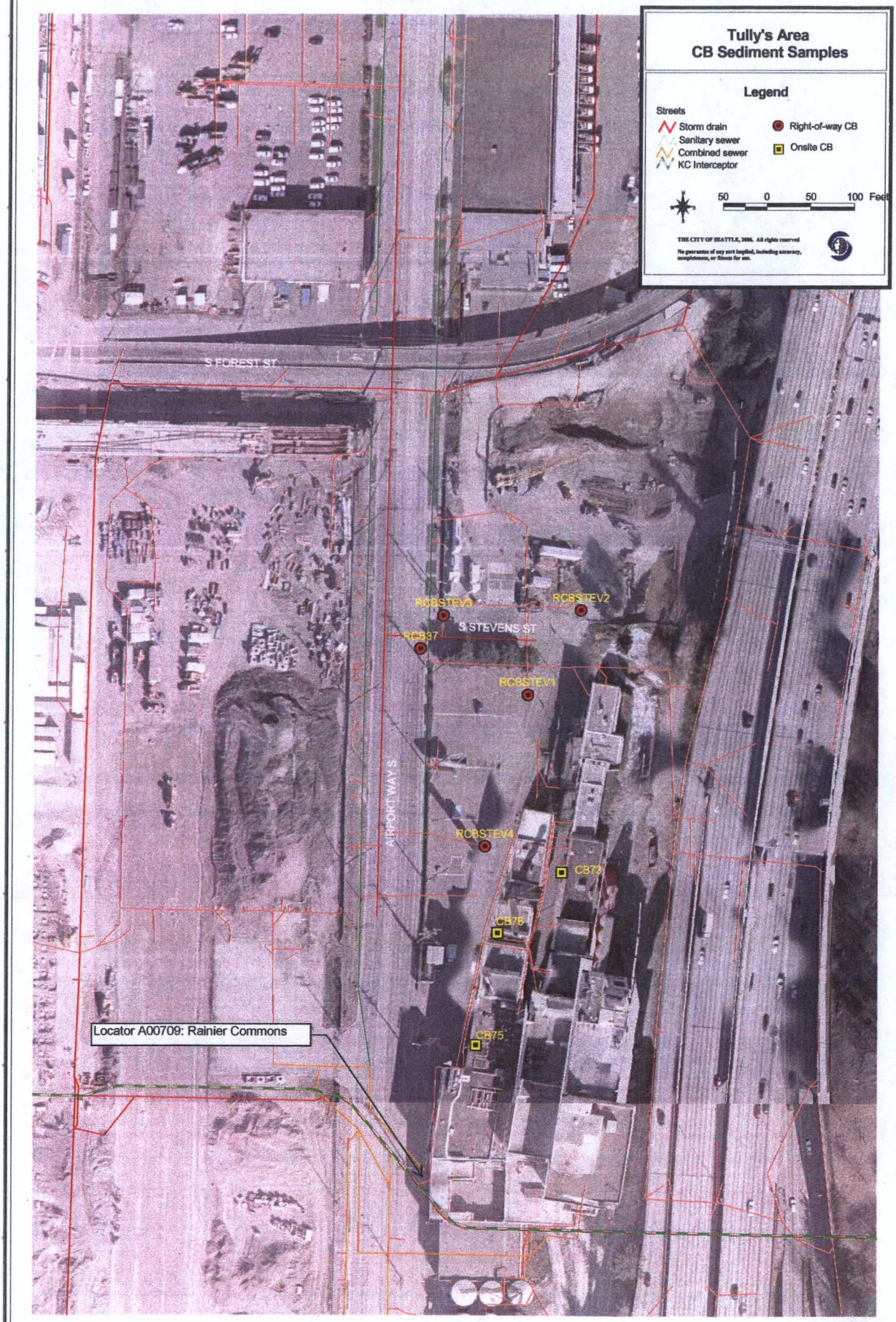
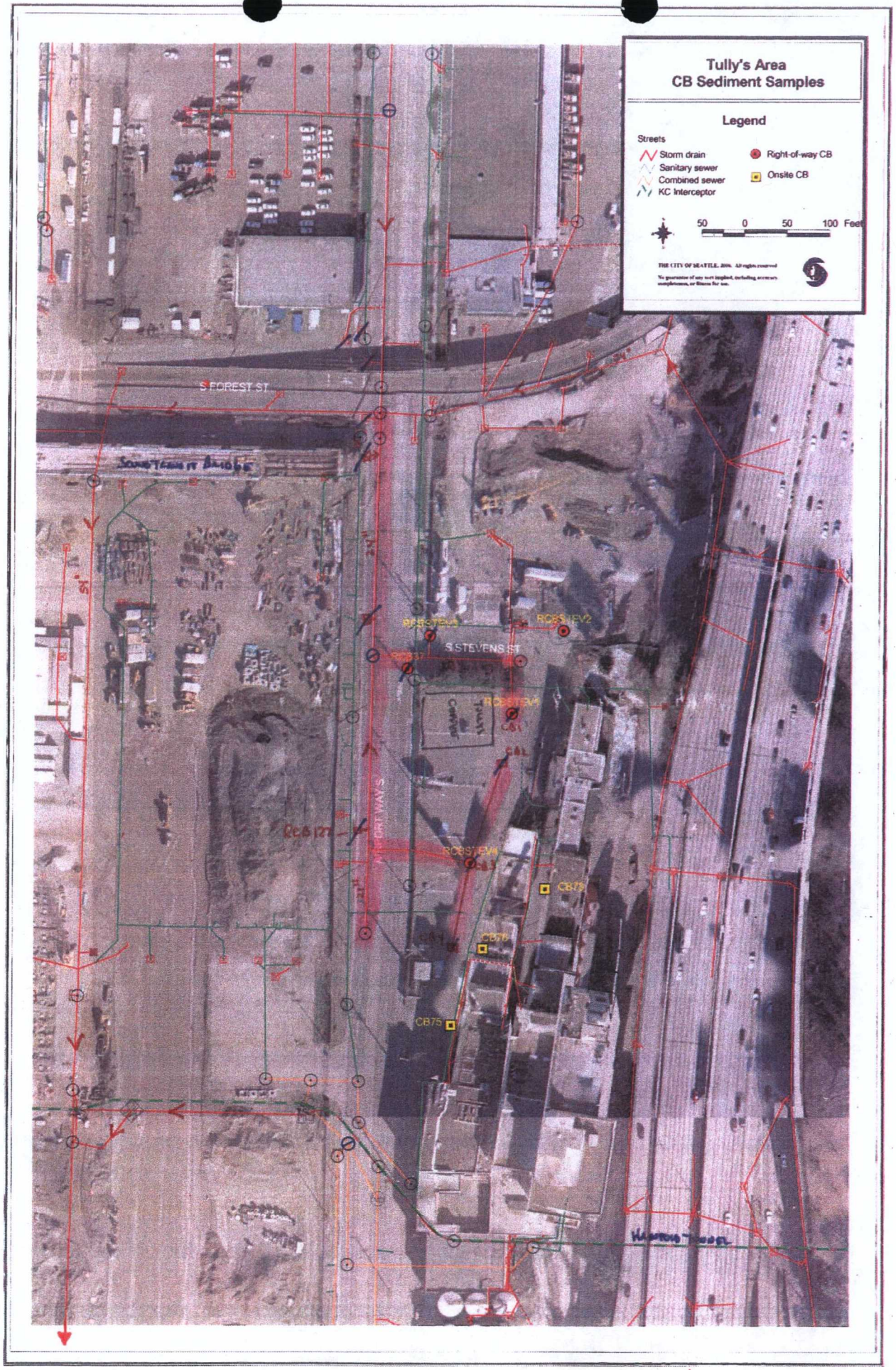
BLD 5
FL 400
BLD 6
FL 500
BLD 25
FL 300
BLD # 9
FL 2,300
PARKING
T - TRANSFORMER, BUILDING #, FLOOR #
- STORM CATCH BASIN
- SEWER MAN-HOLE
- STORM LINE
- SEWER LINE


Tully's Area
CB Sediment Samples
Legend
Streets
Storm drain
Sanitary sewer
Combined sewer
KC Interceptor
Right-of-way CB
Onsite CB
50 0 50 100 Feet
THE CITY OF SEATTLE, 2006. All rights reserved
No guarantee of any sort implied, including accuracy, completeness, or fitness for use.
S FOREST ST
S STEVENS ST
AIRPORT WAY S
RCBSTEV3
RCBSTEV2
RCB37
RCBSTEV1
RCBSTEV4
CB73
CB76
CB75
Locator A00709: Rainier Commons



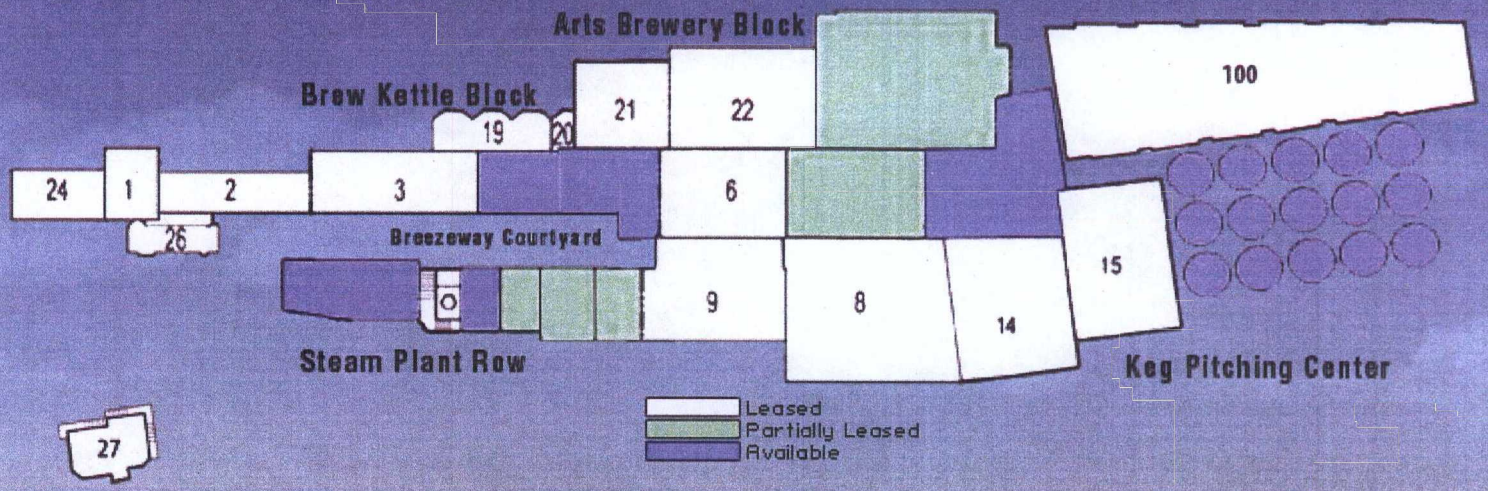
— Cleaned 1/10/08 By Brand

CB1 — CB4 Sampled 1/09
By Brand 1/10 - 11/08

HOME | SALES | LEASING | TENANTS | HISTORY

The Old Rainier Brewery

Where Art Meets Industry



Areas for Lease at 3100 Airport Way South

Building 15 Level 200 – 4,500 square feet
Polished wood floor, Brick walls, 12' ceiling (10'6" to bottom of beam), East & West factory fenestration (windows), Dual egress, Place of gathering potential 200 person occupancy, 4 men's/4 women's bathroom, 110v & 220v power, Isolated occupancy from other structures (only Tully's Bean stock room below).

Building 14/18 Level 200 – 10,000 square feet
All concrete construction w/ some brick walls, 14' ceiling, 4' elevated West outdoor stage, Dual egress +, Place of gathering potential for 900 person occupancy, 4 men's/4 women's bathroom, 110v, 208y\v, 480v power, ideal location for Restaurant / Community Center

Building 7 Level 400 & 500 – 9,000+ square feet
2 – 4,500 square foot floors - All concrete construction w/ some brick walls, 14' & 16' ceilings, South & west 9'x9' window per bay, 110v, 208y\v power, "B" office Occupancy ideal for production studios.

Building 4, 5 & 5a Levels 200 & 600 – 10,000+ square feet
2 – 4,500 square foot floors - All concrete construction w/ some brick walls, 14' & 16' ceilings, South & west 9'x9' window per bay, 110v, 208y\v power, "B" office Occupancy ideal for production studios.

The Retail Block - Building 10,11,12,13 & 23 Level 200 – 8,000 square feet
All historic brick , 14' to 25' ceilings, Storefront Office/Commercial Occupancy,, Dual, 110v, 208y\v power, ideal location for boutique shop, arts production shop (such as glass

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	Rainer Commons, LLC ~~Aviel Development, LLC~~
3/24/09	F12361		
2. INSPECTOR'S ADDRESS US EPA - Oregon operations office. 805 SW Broadway, suite 500 Portland, Oregon 97205			4. FACILITY ADDRESS 3100 Airport Way South Seattle, Washington 98134

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE		RECIPIENT'S SIGNATURE	
NAME Bruce Long		NAME Eitan Alon	
TITLE EPS	DATE SIGNED 3/24/09	TITLE Owner's Rep.	DATE SIGNED 3/24/09

EPA FORM 7740-3 (REVISED JULY 1997) CORE TSCA --- PREVIOUS VERSIONS ARE OBSOLETE INSPECTOR'S COPY

*U.S. GPO: 2000-468-422/45055

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT
TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			4. FACILITY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	Rainier Commons, LLC ~~Ariel Development, LLC~~
3/24/09	I-12361		
2. INSPECTOR'S NAME			5. ADDRESS
Bruce Long			3100 Airport Way S, Seattle, Washington
3. INSPECTOR'S ADDRESS			~~6. NAME OF CHIEF EXECUTIVE OFFICER~~
USEPA - Oregon operations office 805 SW Broadway, Suite 500 Portland, Oregon 97205			Eitan Alon - Owner's Rep.
			7. TITLE

For internal EPA use. Copies may be provided to recipient as acknowledgment of this notice.

TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA.

Some or all information collected by EPA during the inspection may be claimed as confidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A CBI claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

US EPA - Region 10 Attn: Dan Duncan - Mail Stop 980
1200 Sixth Ave
Seattle, Washington 98101

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE I acknowledge receipt of this notice:		If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.
SIGNATURE		NAME
NAME	Eitan Alon	TITLE
TITLE	DATE SIGNED	ADDRESS
Owner's Rep.	3/24/09	

EPA FORM 7740-4 (Revise July 1997) PREVIOUS VERSIONS ARE OBSOLETE

FILE COPY

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	Rainer Commons, LLC ~~Axiel Development, LLC~~
3/24/2009	F12361		
3. INSPECTOR ADDRESS USEPA - Oregon Operations Office 805 SW Broadway, Suite 500 Portland, Oregon 97205			4. COMPANY ADDRESS 3100 Airport Way South Seattle, Washington 98134

For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
(1)	Samples 1 - oil from elevator Building No. 5 1 - Paint from wall Building No. B 1 - Paint from ground Building No. 13 1 - Soils from SD-1
(2)	Drawing of Catch Basins & Sumps One page
(3)	Will inventory electrical items inside cabinet building No 9 by 30 days from today

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☒

INSPECTOR SIGNATURE	CLAIMANT SIGNATURE
Bruce Long	
NAME: Bruce Long	NAME: Eitan Alon
TITLE: EPS	DATE SIGNED:
TITLE: Owner's Rep.	DATE SIGNED: 3/24/09

EPA FORM 7740-1 (REVISED JULY 1996) C TSCA --- PREVIOUS VERSIONS ARE OBSOLETE

INSPECTOR'S COPY

☆ U.S. GPO: 2001—617-481

III

Corporations: Registration Detail

Corporations Division - Registration Data Search

RAINIER COMMONS LLC

UBI Number	602294383
Category	LLC
Profit/Nonprofit	Profit
Active/Inactive	Active
State Of Incorporation	WA
Date of Incorporation	05/09/2003
Expiration Date	05/31/2009
Dissolution Date	
Registered Agent Information	
Agent Name	RSC CORPORATION
Address	1201 3RD AVE STE 3400
City	SEATTLE
State	WA
ZIP	981013034
Special Address Information	
Address	
City	

State

Zip

Governing Persons

Title	Name	Address
Member	GOLDFARB , BRETT	SEATTLE , WA
Member	HAZAN , HERZEL	SEATTLE , WA
Member	MIZRAHI , SHIMON	SEATTLE , WA
Member	HAZAN , ELAN	SEATTLE , WA
Member	MIZRAHI , ITZIK	SEATTLE , WA
Member	ENTERPRISES LLC , MICHEAL J GOLDFARB	SEATTLE , WA
Member	OHAYAN , TAMIR	SEATTLE , WA

« Return to Search List

You can find this information at: http://www.secstate.wa.gov/corps/search_detail.aspx?ubi=602294383

Corporations: Registration Detail

Corporations Division - Registration Data Search

ARIEL DEVELOPMENT LLC

UBI Number	602620432
Category	LLC
Profit/Nonprofit	Profit
Active/Inactive	Active
State Of Incorporation	WA
Date of Incorporation	06/06/2006
Expiration Date	06/30/2009
Dissolution Date	
Registered Agent Information	
Agent Name	RSC CORPORATION
Address	1201 3RD AVE STE 3400
City	SEATTLE
State	WA
ZIP	981013034
Special Address Information	
Address	
City	

State

Zip

Governing Persons

Title	Name	Address
Manager	HAZAN , HERZEL	3317 3RD AVENUE SOUTH SUITE 200 SEATTLE , WA
Manager	MIZRAHI , SHIMON	3317 3RD AVENUE SOUTH SUITE 200 SEATTLE , WA

« Return to Search List

You can find this information at: http://www.secstate.wa.gov/corps/search_detail.aspx?ubi=602620432

IV

Megan Pickett/R10/USEPA/US
04/10/2009 03:41 PM

To Bruce Long/R10/USEPA/US@EPA
cc Karen Norton/R10/USEPA/US@EPA
bcc
Subject Preliminary Results for Rainier Commons, OOO-138A

Preliminary Results for Rainier Commons
OOO-138A

09124300 - wipe
1254 at 8.9 ug
The sample also appears to contain chlordane.

09124301 - paint chips
1260 at estimated 300 mg/kg
1254 at estimated 400 mg/kg

09124302 - paint chips
1260 at estimated 4000-5000 mg/kg
1254 at estimated 6000-7000 mg/kg

09124303 - soil
1260 at estimated 50000 ug/kg (or 50 ppm)
1254 at estimated 55000 ug/kg (or 55 ppm)

The information in this report is being supplied to you at your request as 'Preliminary Results'. Results have not undergone the same level of review as a final report. Once all reviews have taken place, it is possible that results in the final report may vary from those in this report

Megan Pickett
Chemist
U.S. EPA Region 10 Laboratory
Phone: (360) 871-8719
Fax: (360) 871-8747

Attachment 3: TSCA PCB Site-Specific Inspection Plan (PSSIP)

This PSSIP will be prepared and used in conjunction with the Generic PCB QAPP, Revision 3.0, Rev. 12/07 for collecting samples of opportunity during an announced and unannounced inspections. Please refer to the Generic QAPP for specific details regarding PSSIP. Note: Table -1 DQOs : Do not remove analytes from this generic table. Fill in the number of samples for each applicable analysis/matrix. If the number of samples column is left blank for a particular analysis, the RSCC, QAO and LAB will presume that the analysis is not required for the project. Submit the PSSIP to the RSCC for laboratory coordination/sample numbers/project information and to the QAO for review and concurrence. This form can be E-mailed to plewe.bethany@epa.gov or crawford.jennifer@epa.gov or faxed - 206-553-8210.

Project Account Code	Sample Numbers	EPA Inspectors/Phone Numbers/Mail Stop
OOO-138A	09124300-4349	Bruce Long – 502-326-3686; OOO
(20092010B10P501E50C)		

Site Name/Facility Type:	Rainer Commons
Address:	Seattle, Washington
Contact Person:	Eitan Alon
E-mail Address /Phone Number:	206-447-0263

COOPERATING AGENCIES/PARTIES INVOLVED:

Contact Person	Agency	Phone Number

TENTATIVE PROJECT SCHEDULE

Activity	Estimated Start Date	Estimated Completion Date	Comments
Mobilize to Site	03/23/2009	03/27/2009	
Sample Collection	03/23/2009	03/27/2009	Samples will be collected over a three day period
Laboratory Receipt of Samples	03/30/2009	03/31/2009	
Target Completion Date	04/30/2009		

DATA DISTRIBUTION

Name and Mail Stop	Electronic	Hard Copy
Bruce Long OOO	Yes	Yes

FOR QAO REVIEW ONLY

QA Reviewer Concurrence with the PSSIP : Jennifer Crawford _____ *Date :* 03/12/09

Print Name and Signature

If the QA reviewer has concerns and comments, a signed copy of the comments should be sent to the FPO, CO, RSCC and the laboratory. The comments should be attached to the project file.

Rainer Commons – Seattle, Washington

Table 1 - Data Quality Objectives Summary

Analytical Group	Number of Samples[1]	# of QA Samples: Field Dups / Field Blanks / Trip Blanks / Equipment Rinsate Blank	MS / MSD Samples	Matrix	EPA Method	Method Detection Limits	Accuracy	Precision (RPD)	Complete-ness	Preserva-tion	Volume, Container	Holding Time (days)
Laboratory Measurements												
PEST/PCBs	5	1 dup/ 1 rinsate per day of sample collection	1/20 or 1 per batch	soil	8082	1 ppm	50-150	50	85	ice	4 oz wide-mouth glass jar	14 days extraction 40 days analysis
PEST/PCB		1 dup/ 1 rinsate per day of sample collection	1/20 or 1 per batch	water	8082	1 ppm	50-150	50	85		1 Liter	7 days extraction 40 days analysis
PEST/PCB	5	1 dup/ 1 rinsate per day of sample collection	1/20 or 1 per batch	wipes	8082	total ug/wipe	50-150	50	85		wide mouth glass jars	14 days extraction 40 days analysis
PEST/PCB	5	1 dup/ 1 rinsate per day of sample collection	1/20 or 1 per batch	concrete	8082	1 ppm	50-150	50	85		wide mouth glass jars	14 days extraction 40 days analysis
PEST/PCB	5	1 dup/ 1 rinsate per day of sample collection	1/20 or 1 per batch	oil	8082	1 ppm	50-150	50	85		wide mouth glass jars	14 days extraction 40 days analysis
PEST/PCB		1 dup/ 1 rinsate per day of sample collection	1/20 or 1 per batch	PUF	TO10A	1 ppm	50-150	50	85		wide mouth glass jars	14 days extraction 40 days analysis
Field Measurements												
PCB screen		1 dup per batch	1/20 or 1 per batch	transforme r oil	9079	5 ppm	50-150	50	85		glass jars	Analyze in the field No HT
pH		1 dup per batch	1/20 or 1 per batch	solid/ liquid	9045C	NA	∀ 0.1 pH Unit	∀ 0.1 pH Unit	100%	None Required	Field Sample Container	Analyze Immediately

1 - Sample number includes QA samples and Matrix Spike / Matrix Spike Duplicate (MS/MSD) samples listed in the next two columns. P,G - Plastic, Glass.
NOTE: Include one temperature blank per ice chest shipped.

Attachment 1. Sample Alteration Form

Project Name and Number: Rainer Commons
Material to be Sampled: _____
Measurement Parameter:

Standard Procedure for Field Collection & Laboratory Analysis (cite reference):

_____
Reason for Change in Field Procedure or Analysis Variation:

_____
Variation from Field or Analytical Procedure:

_____
Special Equipment, Materials or Personnel Required:

_____

Initiators Name: Bruce Long _____ Date:

Project Officer: _____ Date:

QA Officer: _____ Date:

Attachment 2. Corrective Action Form

Project Name and Number: Rainer Commons
Sample Dates Involved:
Measurement Parameter:

Acceptable Data Range:
Problem Areas Requiring Corrective Action:

Measures Required to Correct Problem:
Means of Detecting Problems and Verifying Correction:

Initiators Name:_____ Date:

Project Officer:_____ Date:

QA Officer:_____ Date:

Jennifer Crawford/R10/USEPA/US
03/12/2009 04:25 PM

To Christopher Pace/R10/USEPA/US@EPA, Carol Haines/R10/USEPA/US@EPA, Katie Adams/R10/USEPA/US@EPA, Patricia
cc Bruce Long/R10/USEPA/US@EPA
bcc
Subject Rainier Commons, OOO-138A --- FORMAL REQUEST

EPA Region 10
Manchester Laboratory Support Request

Project Name: ***Rainier Commons, Seattle, Washington***
Project Code: OOO-138A
Account Code: 20092010B10P501E50C
Sample Numbers: 09124300-4349

	Criminal	Superfund Remedial	Compliance Monitoring	Drinking Water Programs	Surface Water Protection	RCRA CA	Brownfields	
Program/project*			X - TSCA					
NPM*	OECA	OSWER	OECA	OW	OW	OSWER	OSWER	

* 'X' the Program/ Project then change 'frequent' NPM below if necessary. For compliance monitoring/criminal projects, also write in the specific data use such as RCRA, NPDES, TSCA, etc. after the 'X'. For surface water, specify 'TMDL' after the 'X' if applicable.

RAP ANALYSES REQUESTED:

PARAMETER OR GROUP OF COMPOUNDS	METHOD	REPORTING LIMITS	# Wipes	# Soil	# Oil	# Concrete
PCB (wipes)	8082	1ppm, 1ug/100cm^2 wipe	5			
PCB	8082	1 ppm		5	5	5

Sampling/Shipping Dates: Sampling March 23-27, 2009. Delivered to lab March 30-31, 2009.

Turnaround Time Requested: Usual 8 weeks.
Q.A. Chemist Reviewing QAPP: Jennifer Crawford
Final Data Will Be Sent to: Bruce Long, Inspector, EPA R10 Oregon Opps Office
Who Reviews?: MEL for MEL
Project Manager: Bruce Long **Phone**: (503) 326-3686
Has this project been previously requested/if so when? No
Comments: **PCB Generic QAPP. PSSIP attached:**

Rainier Commons PCB PSSIP 3-09.doc

Requested by: Jennifer Crawford, Chemist/RSCC back-up **Date**: March 13, 2009

Phone: (206) 553-6261
Fax: (206) 553-8210
crawford.jennifer@epa.gov

BELOW FOR LAB USE ONLY

Accepted Parameters:

Rejected Parameters:

Comments:

Transmitted by: Date:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

CORRECTIVE ACTION NOTICE

Project name: RAINIER COMMONS
Date Received: 3/26/09
Project code: OOO-138A
Account Code: 0910B10P501E50C
Project Officer: BRUCE LONG
Phone: 503-326-3686
Samplers: BRUCE LONG, USEPA-OOO
Recorder: BRUCE LONG, USEPA-OOO
Sample Numbers: 09124300-4303

	Shipping Container - Addressed incorrectly (must be addressed to "Sample Custodian)
	Shipping Container - Samples improperly packed for shipment
	Shipping Container – Cooler Return information not provided
	Custody Seals - Custody Samples received with seals missing/broken
	Chain of Custody – Missing/Outdated Form
X	Chain of Custody – Missing/Incorrect sampling information (date/project name/code)
	Chain of Custody – Missing/Incorrect EPA numbers
	Chain of Custody – No analysis/Incorrect analysis listed for received samples
	Chain of Custody – Samples listed not included in shipment
	Unique Container ID* – Missing on COC and/or Not written on the container
	Unique Container ID* – Incorrectly assigned
	Sample Container - Labels Missing/Damaged/Illegible
	Sample Container - EPA Sample Numbers Missing/Incorrect
	Sample Container - Received at elevated temperature (above 6°C)
	Sample Container - Received at wrong pH
	Sample Container – Broken/Leaking

* per Region 10 Sample Receiving SOP

Additional Information:

1. **The sample collection dates were not recorded on the chain of custody form. The information was obtained from the sample containers and confirmed by speaking to the project officer.**

Transmitted by: Katherine York, ESAT/ECC Date: 3/27/09

Original: File

RSCC: Jennifer Crawford

Project Officer: Bruce Long

Laboratory Director: Barry Pepich

Laboratory Staff: Gerald Dodo, Chris Pace, Carol Haines, Megan Pickett, Randy Cummings, Steve Reimer, Pat Coogan, Karen Norton and Dana Talley.

CC: none

EPA Region 10, 1200 Sixth Avenue, Seattle, WA 98101

Sample Custody & Analysis Require[illegible]orm

EPA Manchester Laboratory, 7411 Beach Drive East, Port Orchard, WA 9[illegible]0-871-8700

Form Effective Date: January 2005

Revision 0

Project Name	Project Code	Method of Shipment/carrier	Airbill Number (if known prior to sealing):
Rainier Commons	000-138A	Hand Delivered	

Account Code	EPA Project Manager/phone number	Check all that apply
2009201018101501250C	Bruce Long - 503-326-3686	☑ Enforce/Custody ☐ Possible Toxic/Hazardous ☐ Data Confidential

Sampler Names (Print & Sign). *Mark* (R) *after name of principal recorder.*
Bruce Long (R)

If applicable, circle the set of selected metals:

Al	Sb	As	Ba	Be
B	Cd	Ca	Cr	Co
Cu	Fe	Pb	Mg	Mn
Mo	Ni	K	Se	Ag
Na	Sn	Tl	V	Zn

(see reverse for more to add/circle)

① Matrix Codes:
10 Water/Liquid (Total)
20 Water/Liquid (Filtered)
40 Sediment/Soil/Solid/Bulk
70 Tissue
80 Oil/Solvent
44 Air filter
42 Wipe/Swab[1]
00 _____

[1] PCB wipe is to be 10cm x 10cm (100 cm²)

#C ② enter the number of containers for each preservative type followed by the appropriate preservation code P ③:
A - HCl
B - HNO_3
C - NaOH
D - H_2SO_4
E - $Na_2S_2O_3$
F - ascorbic acid[2], then HCl
G - $Na_2S_2O_3$+EDTA
H - EDTA
N - No chemical preservation
P - Bottles pre-preserved at lab
T - To be preserved at the lab
[2] $Na_2S_2O_3$ *if required by plan.*

W - _____

☐ Check here if the cooler is iced

Laboratory: *see the applicable QAPP, SOW and/or Analytical Support Request for specific methods and detection, reporting, and/or quantitation limits*

Sampler's comments for the laboratory:
Paint chips may have PCBs with Aroclor 1254, 1260 at 100ppm+

Matrix line one - 42. Not 80

EPA Sample number Yr	Wk	Sequence	Sampling Date & Time Yr	Mo	Day	Time	Matrix ①2	#C ②	P ③	#C ②	P ③	#C ②	P ③	#C ②	P ③	Sampler Initials	Sample/Station Description/Field Measurements	Organics (see reverse) VOA	BNA	Pest	PCB	PAH	Metals (see reverse) CLP	Selected	Mercury	Micro (see reverse) E. Coli	F. Coliform	T. Coliform	General Chemistry (see reverse) TSS	TDS	BOD 5	NO2+NO3	Oil & Grease	Asbestos	Additional Write in Analyses (see reverse)			
09	12	430	09	03	24	1330	10	1	N							BB	0.1 From Elevator Motor				X																	
09	12	431	09	03	24	1430	10	1	N							BB	Paint from Building 13 Wall				X																	
09	12	432	09	03	24	1435	40	1	N							BB	Paint on ground by CB-02				X																	
09	12	433	09	03	24	1445	10	1	N							BB	Soils from CB-501				X																	
		434			25																																	

Chain of Custody Record

Relinquished by (Signature)	Date	Time	Received by (Signature)	Date	Time
Relinquished by (Signature)	Date	Time	Received by (Signature)	Date	Time
Relinquished by (Signature)	Date	Time	Received by **Mobile Lab** for Field Analysis (Signature)	Date	Time
Shipped by (Signature) Bruce	3/26/09	9:40	Received for lab by (Signature)	3/26/09	9:40

Receiving Laboratory Information Condition of Samples upon Receipt at Lab:

Hand delivered

Custody Seals Intact: ☐ yes ☐ no ☑ none

Distribution: White - Laboratory Copy;
Yellow - Regional Sample Control Center (RSCC) Copy; Pink - Field or Office Copy

Additional Matrix Codes: 30 Leachate 50 Sludge 60 Air

Matrix codes: these are the codes in use at the EPA Region 10 Laboratory. Pick the matrix code that best matches the sample matrix. If in the opinion of the sampler, the sample matrix needs to be specially described, select 00 and write in a matrix description. Remember, tissue can be animal or vegetable in nature.

If the write in area becomes filled, cross out one of the pre-printed analyses and write in what is needed. Try to use the bolded analyte symbol/abbreviation (some analyses are not abbreviated).

Organics pre-printed on the form:

PAH Polynuclear Aromatic Hydrocarbons (these are a subset of the compounds reported from GC-MS analyses for BNA - PAH by HPLC or SIM-GC/MS methods are usually requested in order to get low reporting limits). **Pest** Organochlorine Pesticides **PCB** Polychlorinated Biphenyls aka Aroclors **VOA** (aka VOC) - volatile organic compounds **BNA** (aka SVOC or SVOA) - semivolatile organic compounds

Organics that can be written in:

AED scan (detects chlorinated or brominated hydrocarbons) **Butyltins** Butyltins (mono, di, tri, tetra substituted) **CB Con** - Chlorinated Biphenyl Congener analysis **Chlor Hyd.** Chlorinated Hydrocarbons **Chlorophenols** **Gua/Cat** Guaiacols/Catechols scan **Herb** Herbicides **OP Pest** Organophosphorous Pesticides **PBDE** Polybrominated diphenylethers **Resin Acids** **TPH-Dx** Total Petroleum Hydrocarbons, diesel range **TPH-Dx-ext** Total Petroleum Hydrocarbons, diesel range extended to motor oil **TPH-Gx** Total Petroleum Hydrocarbons, gasoline range **TPH-HCID** Total Petroleum Hydrocarbons, identification **THMs** Trihalomethanes

Metals pre-printed on the form *(underlined = 'CLP metals' - mercury must be separately requested)*:

Al aluminum **Sb** antimony **As** arsenic **Ba** barium **Be** beryllium **B** boron **Cd** cadmium **Ca** calcium **Cr** chromium **Co** cobalt **Cu** copper **Fe** iron **Pb** lead **Mg** magnesium **Mn** manganese **Hg** mercury **Ni** nickel **K** potassium **Se** selenium **Ag** silver **Na** sodium **Sn** tin **Tl** thallium **V** vanadium **Zn** zinc

Metals that can be written in and then circled under the box used for designating selected metals:

Au gold **Cr+6** hexavalent chromium **Mo** molybdenum **Sr** strontium **Ti** titanium **W** tungsten **Zr** zirconium

Note: some metals may not be analyzed for on matrices other than soil/sed or water.

Microbiology Analyses pre-printed on the form:

E. Coli Escherichia coli **F. Coliform** Fecal Coliform **T. Coliform** Total Coliform

Microbiology Analyses that can be written in:

Enterococci **MPA** Microscopic Particulate Analysis for Determining GWUDI **G/C** Giardia/Cryptosporidium **Coliphage** **Staph a** Staphylococcus aureus

Toxicity Characteristic Leaching Procedure (TCLP) write in analyses[3]:

TCLP BNA **TCLP Herb** TCLP Herbicides **TCLP met+Hg** TCLP metals including mercury **TCLP met** TCLP metals not including mercury **TCLP Hg** TCLP mercury **TCLP Pest** TCLP Pesticides **TCLP VOA**

[3] Analyses are normally only conducted for analytes with a TCLP regulatory criteria.

General analyses pre-printed on the form:

BOD Biochemical Oxygen Demand **NO2NO3** Nitrite plus Nitrate **Oil & Grease** **TDS** Total Dissolved Solids **TSS** Total Suspended Solids

General analyses that can be written in:

Acidity **Alk** Alkalinity **TNH3** Ammonia **HCO_3** Bicarbonate **Br** Bromide **CO_3** Carbonate **COD** Chemical Oxygen Demand **Cl** Chloride **Color** Color **Cond** Conductivity **CN** Cyanide **CN-W&D** Cyanide, weak & dissociable **Flash** Flash Point **F** Fluoride **Grn Siz** Grain Size **Hard** Hardness **NO_2** Nitrite **NO_3** Nitrate **TNVS** Non-Volatile Solids **NVSS** Non-Volatile Suspended Solids **CLO_4** Perchlorate **pH** **Phenol** Phenolics **SiO_3** Silica - dissolved **SO_4** Sulfate **S** Sulfide **TOC** Total Organic Carbon **TS** Total Solids **% V Slds** % Volatile Solids **TVS** Volatile Solids **TVSS** Volatile Suspended Solids **SetSlds** Settleable Solids **% Tot** % Total Solids **TKN** Total Kjeldahl Nitrogen **T-Phos** Total Phosphorous **D-Phos** Dissolved Phosphorous **O-Phos** Ortho Phosphrous **D-O-Phos** Dissolved Ortho Phosphrous **Turb** Turbidity

Container guidance.

Note: this is general information only - consult the QA Project Plan on appropriate containers and preservatives for each project. Modifying methods may require modifying the number/type of containers. Freezing samples for one or more analyses may require collection of individual containers. Contact the laboratory for minimum sample volumes in situations where sample material is limited. Minimum volumes required for analysis will depend on the analysis and required reporting limits.

Containers for soil/sediment:

Metals/cyanide/mercury: 1, wide mouth 8 ounce glass or HDPE.
Extractable organics: 1, 8 ounce wide mouth amber glass, for one or two analyte groups
Inorganics and organics: 1, sixteen ounce wide mouth amber glass.
VOAs/purgeables: Contact the laboratory for the proper number/type of special Closed-System sample containers.

Containers/chemical preservatives for water[4]:

Metals/regular mercury: 1, one liter HDPE, HNO3 to pH<2
Mercury by method 1631: HCl and 250 mL containers provided by MEL
Cyanide: 1, 250 mL or larger HDPE, remove sulfides and/or residual chlorine then add NaOH to pH>12
Extractable organics (BNA, Pest, PCP, PAH etc.): two, one liter amber glass containers **for each analysis** - if more than one liter will be extracted for the project, it is advisable that the container size match (but not exceed) the volume to be extracted. Two separate volumes are usually collected for each analysis to allow for re-extraction if needed.
VOAs/purgeables: 3, zero headspace 40 mL amber glass vials with Teflon Septa, remove residual chlorine then add HCl to pH<2
Alkalinity: 1, 250 mL or larger HDPE, no extra volume for lab QC
Ammonia: 1, 250 mL or larger HDPE, H2SO4 to pH<2, no extra volume for lab QC
BOD 5: 1, one gallon HDPE, no extra volume for lab QC
TSS: 1, one liter or larger HDPE, no extra volume for lab QC
TDS: 1, 250 mL or larger HDPE, no extra volume for lab QC
Oil & Grease: 1, one liter clear glass, HCl to pH<2, submit 4 **separate** containers for the lab QC sample
NO2+NO3: 1, 250 mL or larger HDPE, H2SO4 to pH<2, no extra volume for lab QC
Br, Cl, F, SO4, CLO4: for analysis by ion chromatography, 1, 100 mL or larger HDPE, no extra volume for lab QC

[4] Water samples to be designated for lab QC should have double volume submitted for metals, triple volume for organics. In general, extra volume is usually not required for lab QC for soil/sediment.

SITE PHOTOGRAPHS

Phase I Environmental Site Assessment Report [2004]
Former Rainier Brewery – Seattle, Washington
Farallon PN: 338-001

Photograph 1: Facing east; view of silo brick wall in Building 5A.

Photograph 2: Facing east; view of aboveground storage tank in vestibule within Building 5A.

Photograph 3: Facing west; view of the elevator mechanical room on the roof of Building 5A.

Photograph 4: Facing west; view of the northern coffee roaster on 4th floor of Building 6.

Photograph 5: Facing northwest; view of afterburners on roof of Building 6.

Photograph 6: Facing north; view of transformers on 2nd floor of Building 7; floor drain located between the transformers.

Photograph 7: Facing southwest; view of coffee packaging machinery on 2nd floor of Building 9.

Photograph 8: Facing northeast; view of three nitrogen and five propane tanks on 2nd floor of Building 9.

Photograph 9: Facing south; view of fuel piping entering Building 13 within vault in southwestern corner of the building.

Photograph 10: Facing north; view of sealed floor drains on 1st floor of Building 14.

Photograph 11: Facing southeast; view of damaged concrete where support pillar meets ceiling on 1st floor of Building 14.

Photograph 12: Facing northeast; view of pooled oil beneath aboveground storage tank on 2nd floor of Building 14.

Photograph 13: Facing northeast; view of equipment associated with the grain and malt transfer system in Building 20.

Photograph 14: Facing north; view through hole formerly occupied by brewing kettle on 3rd floor of Building 21, and electric panel on 2nd floor.

Photograph 15: Facing northwest; view of recessed pit and floor drain on 1st floor of Building 21.

Photograph 16: Facing north; view of Glycol-mixture tank in northeastern corner on 3rd floor of Building 21.

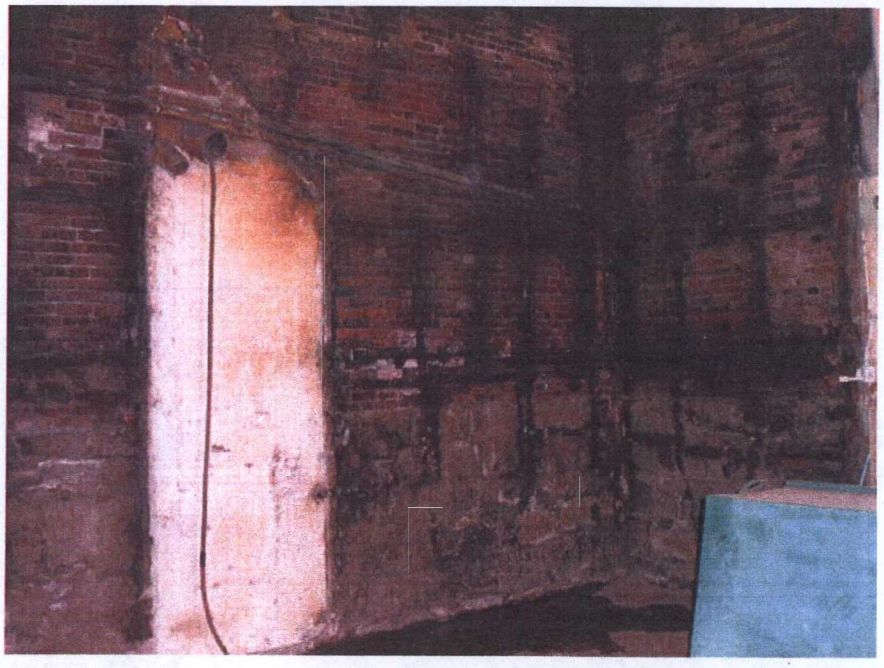
Photograph 17: Facing west; view of staining around drain on 6th floor of Building 21.

Photograph 18: Facing southeast; view of staining on wall, ceiling, and vent plenums on 2nd floor of Building 25, near rear exit.

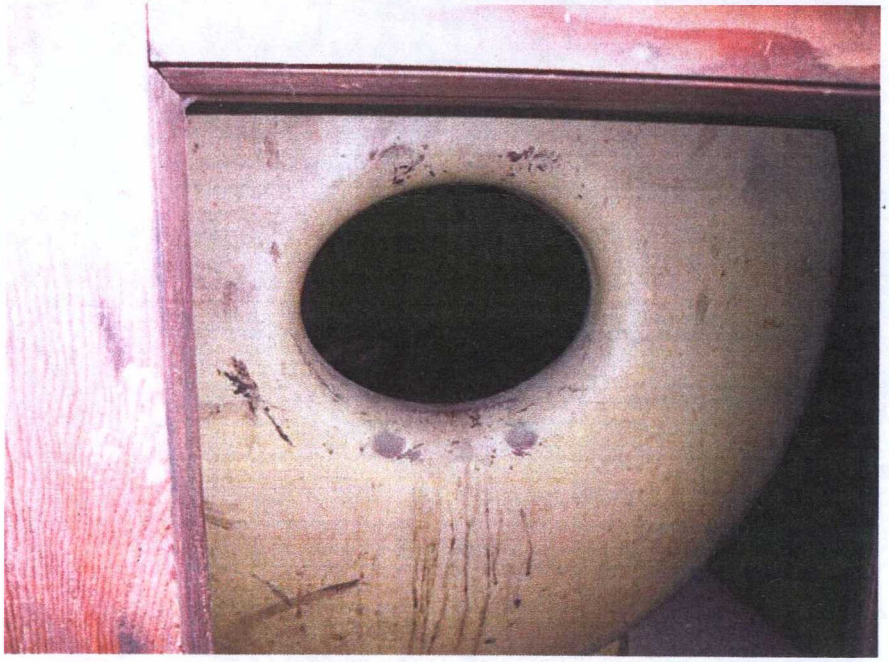
Photograph 19: Facing south; view of fermentation ASTs on 3rd floor of Building 25.

Photograph 20: Facing southeast; view of abandoned forklift in driveway beneath Building 21.

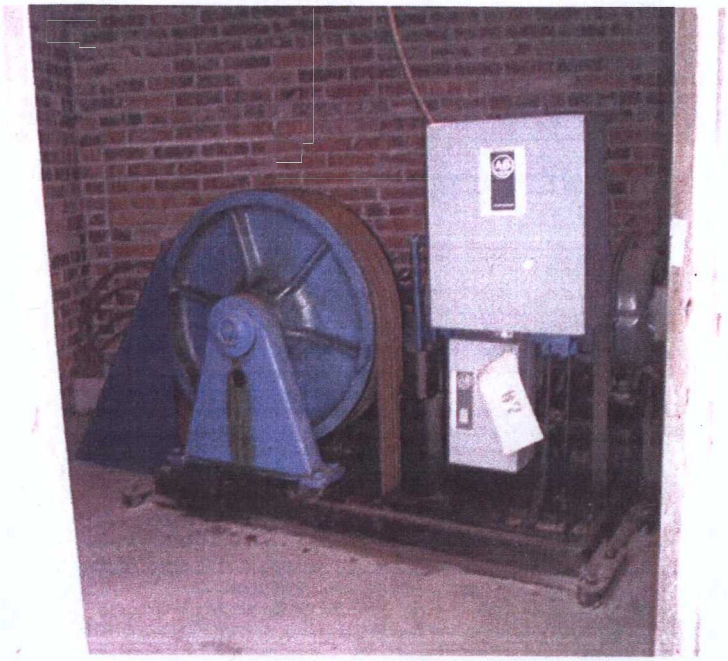
Photograph 21: Facing northwest; view of abandoned storage vessel located adjacent to the entrance to Building 20.



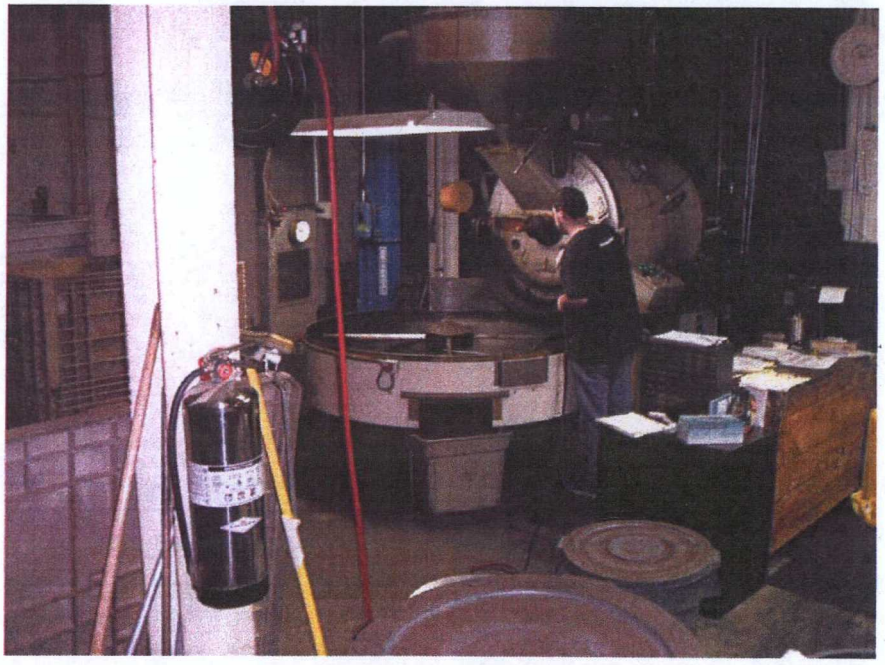
Photograph 1: Facing east; view of silo brick wall in Building 5A.



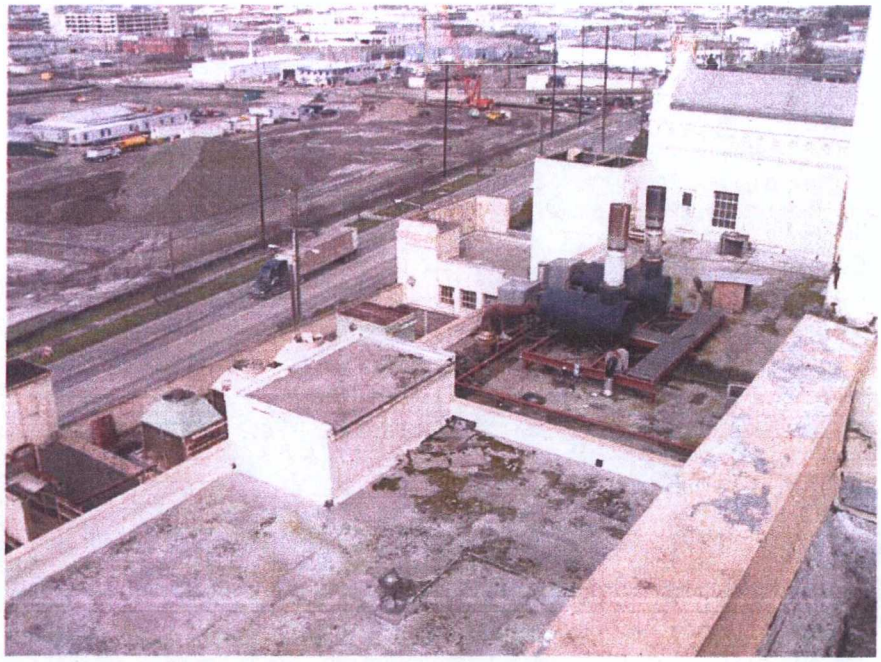
Photograph 2: Facing east; view of aboveground storage tank in vestibule within Building 5A.



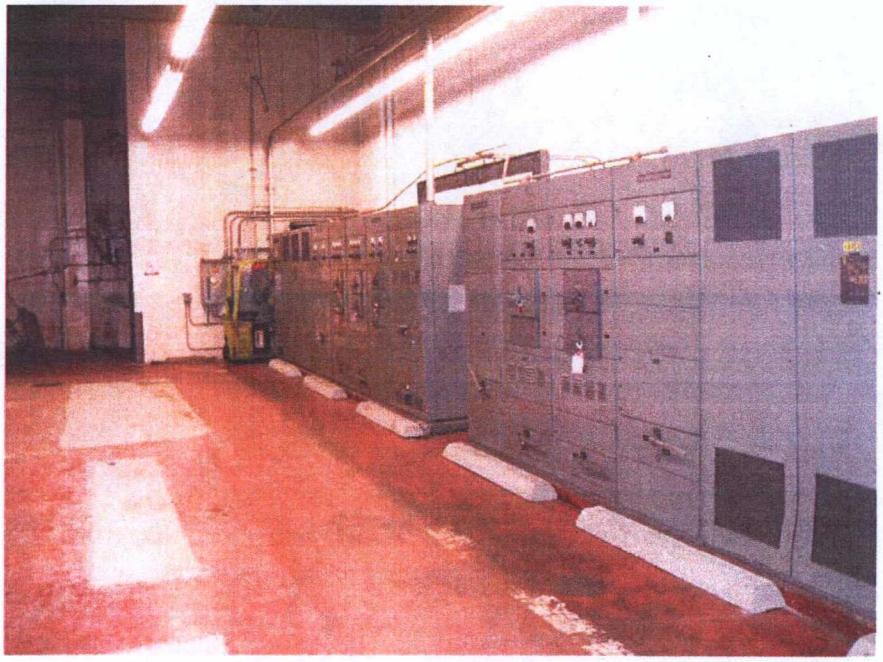
Photograph 3: Facing west; view of the elevator mechanical room on the roof of Building 5A.



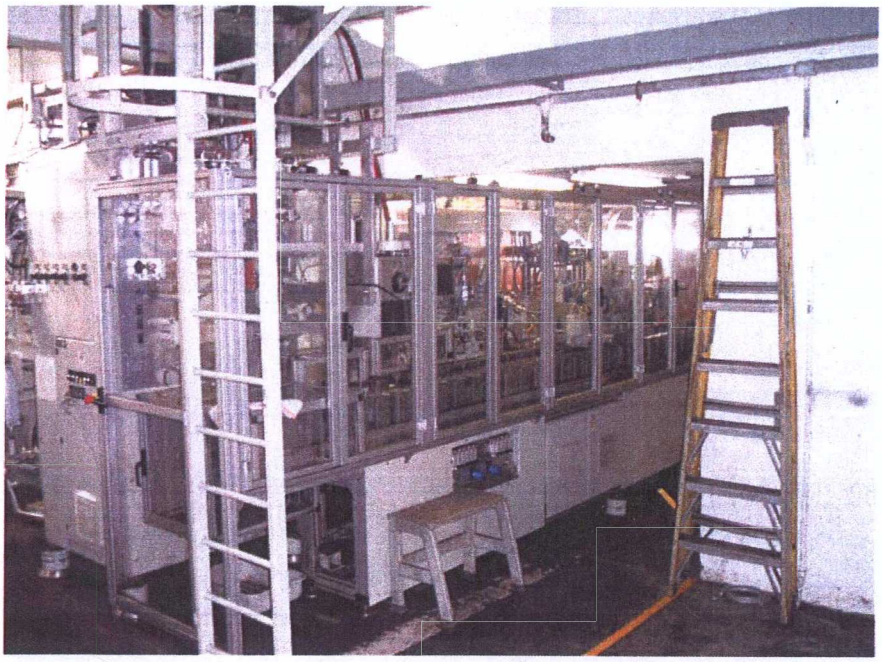
Photograph 4: Facing west; view of the northern coffee roaster on 4th floor of Building 6.



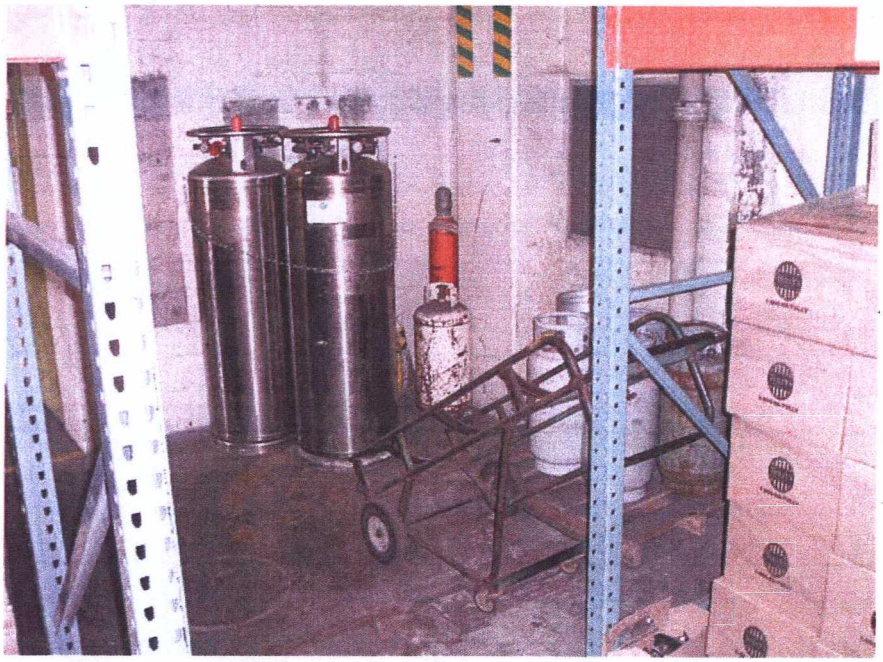
Photograph 5: Facing northwest; view of afterburners on roof of Building 6.



Photograph 6: Facing north; view of transformers on 2nd floor of Building 7; floor drain located between the transformers.



Photograph 7: Facing southwest; view of coffee packaging machinery on 2nd floor of Building 9.



Photograph 8: Facing northeast; view of three nitrogen and five propane tanks on 2nd floor of Building 9.

Photograph 9: Facing south; view of fuel piping entering Building 13 within vault in southwestern corner of the building.

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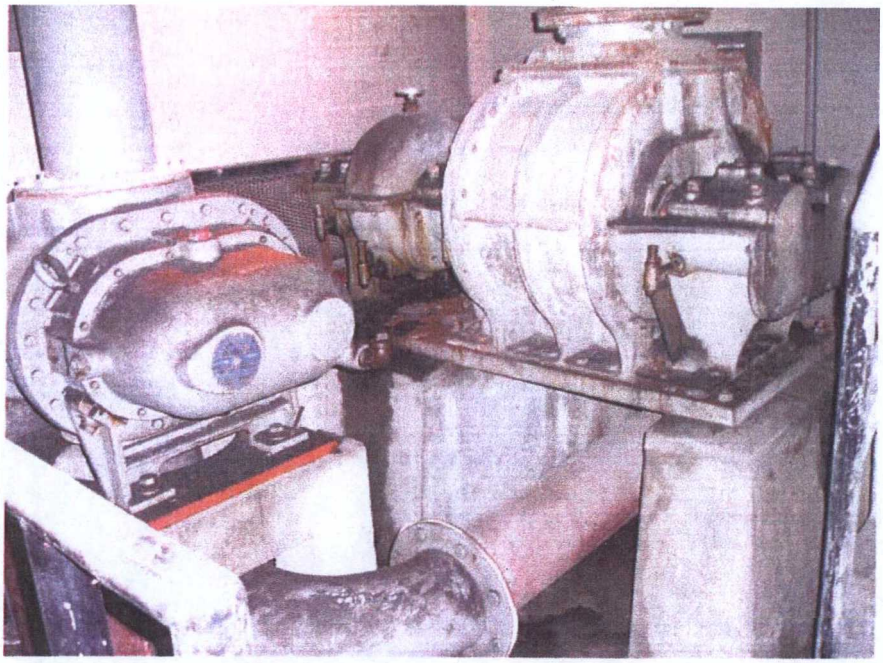
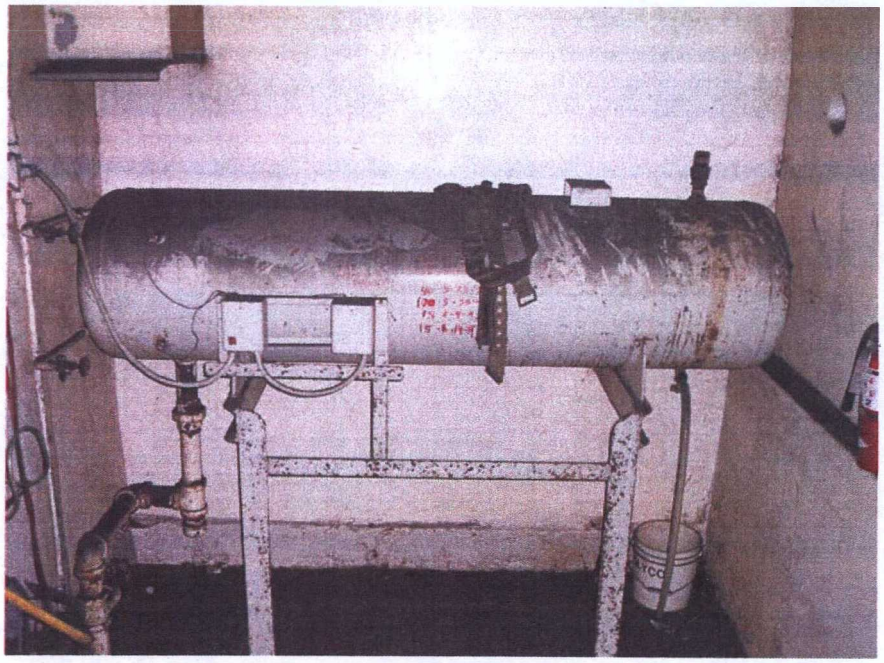
Photograph 12: Facing northeast; view of pooled oil beneath aboveground storage tank on 2nd floor of Building 14.



Photograph 13: Facing northeast; view of equipment associated with the grain and malt transfer system in Building 20.

Photograph 14: Facing north; view through hole formerly occupied by brewing kettle on 3rd floor of Building 21, and electric panel on 2nd floor.

Photograph 15: Facing northwest; view of recessed pit and floor drain on 1st floor of Building 21.



Photograph 16: Facing north; view of Glycol-mixture tank in northeastern corner on 3rd floor of Building 21.

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Photograph 20. Facing southeast; view of abandoned forklift in driveway beneath Building 21.

Photograph 21. Facing northwest; view of abandoned storage vessel located adjacent to the entrance to Building 20.

VI

SPU · 2008.

Betty ·

1/2008

2/2005 - 5.

206-384-1199

S Stevens St/Tully's catch basin samples (dry weight).

Station ID	SQS[a] MTCA	CSL[a]	RCB37[b]	RCB38	CB73	CB74	CB75	CB76	RCBSTV1	RCBSTV2	RCBSTV3	RCBSTV4
Date			06/30/04	06/30/04	10/19/05	10/19/05	10/19/05	10/19/05	08/31/04	08/31/04	08/31/04	08/31/04
TOC (%)			5.44	3.16	NA	12.0	NA	NA	NA	NA	NA	NA
Metals (mg/kg DW)												
Arsenic	57	93	7 U	7 U	NA	30 U	NA	NA	NA	NA	NA	NA
Copper	390	390	**58.8**	**57.7**	NA	**362**	NA	NA	NA	NA	NA	NA
Lead	450	530	**62**	**99**	NA	**430**	NA	NA	NA	NA	NA	NA
Mercury	0.41	0.59	0.06 U	**0.06**	NA	**1.51**	NA	NA	NA	NA	NA	NA
Zinc	410	960	**189**	**197**	NA	**1,810**	NA	NA	NA	NA	NA	NA
Total petroleum hydrocarbons (mg/kg DW)												
TPH -diesel	2,000		**220**	**230**	NA	**740**	NA	NA	NA	NA	NA	NA
TPH-oil	2,000		**1,200**	**1,300**	NA	**3,400**	NA	NA	NA	NA	NA	NA
LPAH (ug/kg DW)												
Acenaphthene			**78**	**1,200**	NA	44 U	NA	NA	NA	NA	NA	NA
Acenaphthylene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Anthracene			**180**	**2,000**	NA	44 U	NA	NA	NA	NA	NA	NA
Fluorene			**120**	**1,400**	NA	**81**	NA	NA	NA	NA	NA	NA
Naphthalene			**70**	**1,100**	NA	**2,500**	NA	NA	NA	NA	NA	NA
Phenanthrene			**1,000**	**9,100**	NA	**870**	NA	NA	NA	NA	NA	NA
HPAH (ug/kg DW)												
Benzo(a)anthracene			**520**	**2,700**	NA	**190**	NA	NA	NA	NA	NA	NA
Benzo(a)pyrene			**420**	**2,000**	NA	**98**	NA	NA	NA	NA	NA	NA
Benzo(b)fluoranthene			**820**	**3,000**	NA	**200**	NA	NA	NA	NA	NA	NA
Benzo(g,h,i)perylene			**130**	**330**	NA	44 UJ	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene			**520**	**1,900**	NA	**170**	NA	NA	NA	NA	NA	NA
Chrysene			**750**	**2,900**	NA	**280**	NA	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene			56 U	**87**	NA	44 U	NA	NA	NA	NA	NA	NA
Fluoranthene			**1,700**	**10,000**	NA	**920**	NA	NA	NA	NA	NA	NA
Indeno(1,2,3-cd)pyrene			**140**	**460**	NA	**44**	NA	NA	NA	NA	NA	NA
Pyrene			**1,600**	**7,200**	NA	**490**	NA	NA	NA	NA	NA	NA
Phthalates (ug/kg DW)												
Bis(2-ethylhexyl)phthalate			**8,300**	**3,300**	NA	**13,000**	NA	NA	NA	NA	NA	NA
Butylbenzylphthalate			**410**	**270**	NA	**1,000**	NA	NA	NA	NA	NA	NA
Diethylphthalate			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Dimethylphthalate			**540**	54 U	NA	**1,000**	NA	NA	NA	NA	NA	NA
Di-n-butylphthalate			**61**	**120**	NA	**52,000**	NA	NA	NA	NA	NA	NA
Di-n-octyl phthalate			**760**	**210**	NA	**2,400**	NA	NA	NA	NA	NA	NA
PCBs (ug/kg DW)												
Aroclor 1016			130 U	130 U	150,000 U	180 U	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1221			130 U	130 U	150,000 U	180 U	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U

S Stevens St/Tully's catch

Station ID	TUL-CB1	TUL-CB2	TUL-CB3	TUL-CB4	RCB37	RCB125	RCB126	RCB127
Date	01/09/08	01/09/08	01/09/08	01/09/08	01/11/08	01/11/08	01/11/08	01/11/08
TOC (%)	NA	NA	NA	NA	7.40	6.91	9.79	10.90
Metals (mg/kg DW)								
Arsenic	NA	NA	NA	NA	**10**	**10**	20 U	20 U
Copper	NA	NA	NA	NA	**127**	**115**	**153**	**127**
Lead	NA	NA	NA	NA	**94**	**82**	**74**	**65**
Mercury	NA	NA	NA	NA	**0.11**	**0.11**	**0.2**	0.2 U
Zinc	NA	NA	NA	NA	**496**	**459**	**793**	**674**
Total petroleum hydrocarbo								
TPH -diesel	NA	NA	NA	NA	NA	NA	NA	NA
TPH-oil	NA	NA	NA	NA	NA	NA	NA	NA
LPAH (ug/kg DW)								
Acenaphthene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Acenaphthylene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Anthracene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Fluorene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Naphthalene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Phenanthrene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
HPAH (ug/kg DW)								
Benzo(a)anthracene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(a)pyrene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(b)fluoranthene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(g,h,i)perylene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(k)fluoranthene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Chrysene	NA	NA	NA	NA	950 U	910 U	650 U	**670**
Dibenz(a,h)anthracene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Fluoranthene	NA	NA	NA	NA	**1,000**	**1,000**	**1,000**	**1,100**
Indeno(1,2,3-cd)pyrene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Pyrene	NA	NA	NA	NA	**1,700**	**1,100**	**1,100**	**1,200**
Phthalates (ug/kg DW)								
Bis(2-ethylhexyl)phthalate	NA	NA	NA	NA	**18,000**	**15,000**	**11,000**	**20,000**
Butylbenzylphthalate	NA	NA	NA	NA	950 U	910 U	1,400 U	660 U
Diethylphthalate	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Dimethylphthalate	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Di-n-butylphthalate	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Di-n-octyl phthalate	NA	NA	NA	NA	**3,200**	**1,600**	1,300 U	**2,000**
PCBs (ug/kg DW)								
Aroclor 1016	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U
Aroclor 1221	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U

S Stevens St/Tully's catch basin samples (dry weight).

Station ID	SQS[a] MTCA	CSL[a]	RCB37[b]	RCB38	CB73	CB74	CB75	CB76	RCBSTV1	RCBSTV2	RCBSTV3	RCBSTV4
Date			06/30/04	06/30/04	10/19/05	10/19/05	10/19/05	10/19/05	08/31/04	08/31/04	08/31/04	08/31/04
Aroclor 1232			130 U	130 U	150,000 U	180 U	31,000 U	260,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1242			130 U	130 U	150,000 U	180 U	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1248			130 U	130 U	150,000 U	**2,900**	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1254			**11,000**	**1,800**	**800,000**	**8,800**	**96,000**	**1,200,000**	**9,000**	**1,500**	**130**	**12,000**
Aroclor 1260			**6,500**	**1,100**	**540,000**	**8,100**	**79,000**	**1,000,000**	**8,000**	**1,100**	**71**	**11,000**
Total PCBs	1,000		**17,500**	**2,900**	**1,340,000**	**19,800**	**175,000**	**2,200,000**	**17,000**	**2,600**	**201**	**23,000**
Other organic compounds (ug/kg DW)												
1,2,4-Trichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2,2'-Oxybis(1-chloropropane)			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,4-Dichlorophenol			170 U	160 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,4-Dimethylphenol[c]	29	29	56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2,4-Dinitrophenol			560 U	540 U	NA	440 U	NA	NA	NA	NA	NA	NA
2,4-Dinitrotoluene			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,6-Dinitrotoluene			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2-Chloronaphthalene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2-Chlorophenol			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2-Methylnaphthalene			56 U	**360**	NA	**490**	NA	NA	NA	NA	NA	NA
2-Methylphenol			56 U	54 U	NA	**360**	NA	NA	NA	NA	NA	NA
2-Nitroaniline			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2-Nitrophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
3-Nitroaniline			330 U	320 U	NA	220 U	NA	NA	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol			560 U	540 U	NA	440 U	NA	NA	NA	NA	NA	NA
4-Bromophenyl-phenylether			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol			110 U	110 U	NA	220 U	NA	NA	NA	NA	NA	NA
4-Chloroaniline			170 U	160 U	NA	220 U	NA	NA	NA	NA	NA	NA
4-Chlorophenyl-phenylether			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
4-Methylphenol[c]	670	670	**370**	**250**	NA	**17,000**	NA	NA	NA	NA	NA	NA
4-Nitroaniline			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
4-Nitrophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
Benzoic acid[c]	650	650	560 U	540 U	NA	440 U	NA	NA	NA	NA	NA	NA
Benzyl alcohol[c]			56 U	54 U	NA	**150**	NA	NA	NA	NA	NA	NA
bis(2-Chloroethoxy) methane			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA

Station ID	TUL-CB1	TUL-CB2	TUL-CB3	TUL-CB4	RCB37	RCB125	RCB126	RCB127
Date	01/09/08	01/09/08	01/09/08	01/09/08	01/11/08	01/11/08	01/11/08	01/11/08
Aroclor 1232	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U
Aroclor 1242	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U
Aroclor 1248	580 U	110 U	24,000 U	460 U	170 U	160 U	49 Y	20 U
Aroclor 1254	**10,000**	**4,800**	**110,000**	**9,500**	**1,100**	**8,500**	**81**	**98**
Aroclor 1260	**7,100**	**3,600**	**79,000**	**8,300**	**1,200**	**8,700**	**100**	**54**
Total PCBs	**17,100**	**8,400**	**189,000**	**17,800**	**2,300**	**17,200**	**181**	**152**
Other organic compounds (								
1,2,4-Trichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
1,2-Dichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
1,3-Dichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
1,4-Dichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
2,2'-Oxybis(1-chlo		A	NA	NA	950 U	910 U	650 U	660 U
2,4,5-Trichloro			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2,4,6-Trich			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2,4-Dic			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2,4			NA	NA	950 U	910 U	650 U	660 U
			A	NA	9,500 U	9,100 U	6,500 U	6,600 U
				NA	4,700 U	4,600 U	3,200 U	3,300 U
				NA	4,700 U	4,600 U	3,200 U	3,300 U
				NA	950 U	910 U	650 U	660 U
				NA	950 U	910 U	650 U	660 U
				NA	950 U	910 U	650 U	**660** U
2-M			NA	NA	950 U	910 U	650 U	660 U
2-Nitroa			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2-Nitrophe			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
3,3'-Dichlorob			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
3-Nitroaniline		A	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4,6-Dinitro-2-methylp		NA	NA	NA	9,500 U	9,100 U	6,500 U	6,600 U
4-Bromophenyl-phenyle		NA	NA	NA	950 U	910 U	650 U	660 U
4-Chloro-3-methylphenol		NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4-Chloroaniline		NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4-Chlorophenyl-phenylether	NA	NA	NA	NA	950 U	910 U	650 U	660 U
4-Methylphenol[c]	NA	NA	NA	NA	950 U	910 U	650 U	**2,500**
4-Nitroaniline	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4-Nitrophenol	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
Benzoic acid[c]	NA	NA	NA	NA	9,500 U	9,100 U	6,500 U	6,600 U
Benzyl alcohol[c]	NA	NA	NA	NA	950 U	910 U	650 U	**1,100**
bis(2-Chloroethoxy) methane	NA	NA	NA	NA	950 U	910 U	650 U	660 U

S Stevens St/Tully's catch basin samples (dry weight).

Station ID	SQS[a]	CSL[a]	RCB37[b]	RCB38	CB73	CB74	CB75	CB76	RCBSTV1	RCBSTV2	RCBSTV3	RCBSTV4
Date	MTCA		06/30/04	06/30/04	10/19/05	10/19/05	10/19/05	10/19/05	08/31/04	08/31/04	08/31/04	08/31/04
Bis-(2-chloroethyl) ether			110 U	110 U	NA	44 U	NA	NA	NA	NA	NA	NA
Carbazole			**110**	**1,400**	NA	44 U	NA	NA	NA	NA	NA	NA
Dibenzofuran			56 U	**830**	NA	**57**	NA	NA	NA	NA	NA	NA
Hexachlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Hexachlorobutadiene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Hexachlorocyclopentadiene			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
Hexachloroethane			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Isophorone			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Nitrobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
n-Nitroso-di-n-propylamine			110 U	110 U	NA	220 U	NA	NA	NA	NA	NA	NA
N-Nitrosodiphenylamine			56 U	54 U	NA	100 Y	NA	NA	NA	NA	NA	NA
Pentachlorophenol[c]	360	690	280 U	270 U	NA	220 UJ	NA	NA	NA	NA	NA	NA
Phenol[c]	420	1;200	56 U	**100**	NA	**1,900**	NA	NA	NA	NA	NA	NA

a. Sediment management standards. SQS = sediment quality standard. CSL = cleanup screening level.

b. SPU cleaned CB in 2004-2005

c. Sediment management standard based on dry weight concentration.

MTCA = Method A soil cleanup level for unrestricted use.

Exceeds sediment quality standards (SQS)

Exceeds cleanup screening level (CSL)

J = Concentration is less than the reporting limit.

U = Chemical not detected at concentration shown

Y = Chemical not detected at concentration shown. Reporting limit raised due to background interference.

Data not validated

S Stevens St/Tully's catch

Station ID	TUL-CB1	TUL-CB2	TUL-CB3	TUL-CB4	RCB37	RCB125	RCB126	RCB127
Date	01/09/08	01/09/08	01/09/08	01/09/08	01/11/08	01/11/08	01/11/08	01/11/08
Bis-(2-chloroethyl) ether	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Carbazole	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Dibenzofuran	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Hexachlorobenzene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Hexachlorobutadiene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Hexachlorocyclopentadiene	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
Hexachloroethane	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Isophorone	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Nitrobenzene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
n-Nitroso-di-n-propylamine	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
N-Nitrosodiphenylamine	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Pentachlorophenol[c]	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
Phenol[c]	NA	NA	NA	NA	950 U	910 U	650 U	660 U

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

Reply to: OOO

April 27, 2009

MEMORANDUM

SUBJECT: Rainer Commons, Inc., Seattle, Washington – WAD051239994
Follow-up to PCB Compliance Inspection; March 24, 2009.

FROM: Bruce Long, Compliance Inspector

TO: Scott Downey, Manager
Pesticides and Toxics Unit OCE - 084

Daniel Duncan, PCB Program Manager OCE - 084

During the compliance inspection at the old Rainer Brewery on March 24, 2009, I could not get access to Building 25 that houses an electrical panel that has been reported as a transformer in several older site assessment reports about the facility. At the conclusion of my site visit in March, Mr. Eitan Alon, Rainer Commons, LLC representative, agreed to get access from the lessee of Building 25, take photographs of the electrical panel, and if present, take photos of the transformer. Enclosed are the items I requested from Mr. Alon. Under Attachment I are photographs of the current conduction of the electrical panel in Building 25. Tully's Coffee leases Building 25 and it is the location where Tully's packages its coffee for sale to the public. The electrical panel appears to be in two sections and Mr. Alon provided us with two photos showing both sections (Attachment I).

According to Mr. Alon's report, there are two transformers, one each in the two sections of the panel (Attachment II). Photographs for the name plates are under Attachment II. Enclosed with Mr. Alon's reply is a written statement from the in-house electrician, Mr. Charlos Bitton. In Mr. Bitton's statement, he identifies the two transformers as "Dry Type" and are non-PCB containing. The types of transformers currently in use inside building 25 are confirmed to be "Dry Type" from the nameplate information.

Attachment IV is a copy of the PCB Handler Notification Rainer Commons has submitted to EPA.

This Memorandum closes out my investigation of the Rainer Commons by finalizing the facts regarding the electrical panel and the type of electrical transformer that are inside the panel. No PCB transformers were found inside Building 25, nor were any PCB transformers found in any of the other 23 brewery buildings. If you have any further question, please give me a call.

Rainer Commons
Bk II

"Eitan"
<eitan@arieldevelopment.com>
04/22/2009 01:09 PM

To Bruce Long/R10/USEPA/US@EPA
cc "'Morrill, Pamela'" <MorrillPJ@cdm.com>, "'Flannery, Jo M.'" <Flannery@ryanlaw.com>
bcc
Subject The Old Rainier Brewery, Your inspection dated 3/24/09 no. R12361

History: This message has been replied to.

Bruce,

As per your request, please find attached photos and description of the transformer located in Tully's closed area. Our electrical contractor/engineer has investigated the issue, confirmed the transformer is a dry type one and has provided us a letter to this effect. The letter is attached here.

Should you have further information required, please do not hesitate to call me on my cell: 206 898 8561.

Kind regards

Eitan Alon
Ariel Development
3317 3rd Ave S
Seattle WA 98134
Tel: 206 447 0263
Fax: 206 447 0299
eitan@arieldevelopment.com
www.arieldevelopment.com

(2).JPG (3).JPG (6).JPG New Microsoft Word Document.doc bldg 9 transformer.pdf (5).JPG 1.JPG


3/27/2009 10:18

3/27/2009 10:17

II


FLEX® UNIT
600 V.A.C.
MAX. H.P. 150 MAX. H.P. 300
MAX. H.P. 50
USE TIME DELAY FUSES ABOVE STD.
SERIES 4
SQUARE D COMPANY
3/27/2009 10:19

Power-Zone®

TRANSFORMER

KVA CONT.

PRI. VOLTS

SEC. VOLTS

INSTR. BOOK

IMPULSE LEVEL FULL WAVE

TEST PRI. VOLTS KV

SEC. VOLTS

APPROXIMATE WEIGHTS

CORE AND COILS

ENCLOSURE

TOTAL WEIGHT

CLASS °C RISE

THREE PHASE CYCLES

SERIAL NO.

IMPEDANCE AT °C

% AA RATING

% AFA RATING

CONNECT VOLTS AMPS

TO

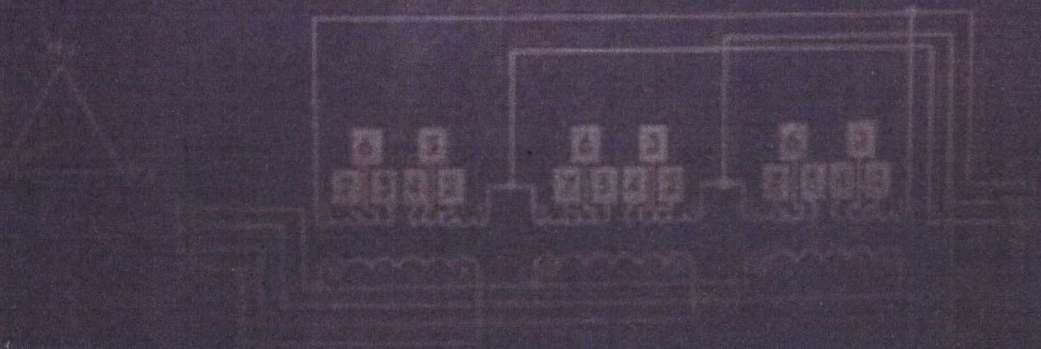
TO

TO

TO

TO

CAUTION: DEENERGIZE TRANSFORMER BEFORE CHANGING TAPS



3/27/2009 10:19

SUB 0.3

Power-Zone®

TRANSFORMER

KVA CONT. | CLASS °C.RISE

PRI. VOLTS | THREE PHASE CYCLES

SEC. VOLTS | SERIAL NO.

INSTR. BOOK | IMPEDANCE AT °C

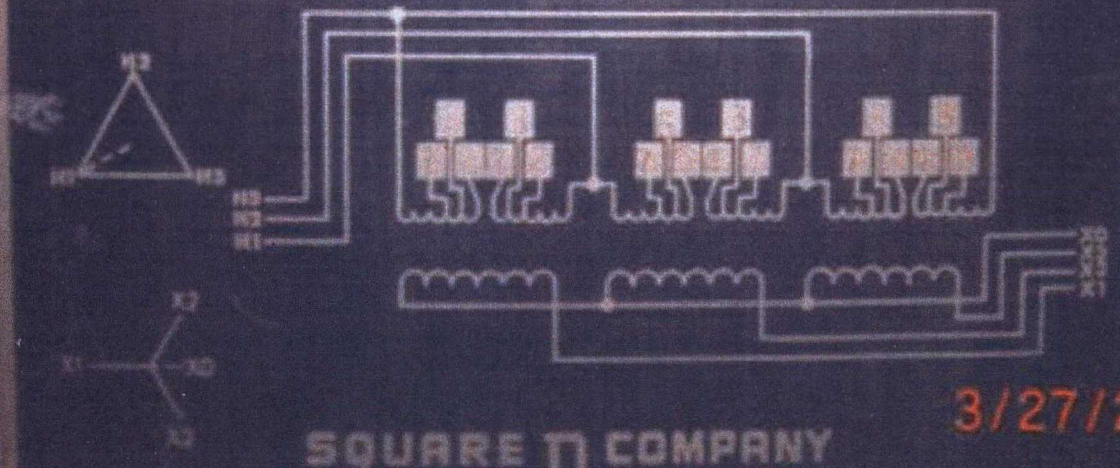
IMPULSE LEVEL FULL WAVE % AA RATING

TEST PRI. VOLTS KV BIL % AFA RATING

SEC. VOLTS KV CONNECT VOLTS AMPS

APPROXIMATE WEIGHTS IN			TO			
CORE AND COILS			TO			
ENCLOSURE			TO			
TOTAL WEIGHT			TO			
			TO			

CAUTION: DEENERGIZE TRANSFORMER BEFORE CHANGING TAPS



SQUARE D COMPANY

DETROIT, MICH. MADE IN U.S.A.

3/27/2009 10:17

square D powerzone transformers class: AA-H seriel # 36626 . Electrical consultant identified initialy as dry type.

AAA ELECTRIC INC
5703 Milwaukee Ave E
Puyallup WA 98372
253 -445-1893

April, 10 2009

To: Rainier Commons,
From: Charles Bitton
RE: Transformers

I have been the general electrical contractor for approximately the last five years on the rainier commons project. I have investigated the two large 4160 to 480 volt transformers located in Tully's packing area and building 25. They are both dry type and after some research and investigation it is my professional opinion that there is no PCB's present in these transformers. If you have any questions or concerns please call me on my cell phone at 253-722-4782.

Sincerely,

Charles Bitton

IK

For the attention of
Bruce Long
503 326 3399

USEPA United States Environmental Protection Agency Washington, DC 20460

Form Approved OMB No. 2070-0112

Notification of PCB Activity

Return To:
Document Control Officer (5305P)
Office of Solid Waste
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460-0001

For Official Use Only

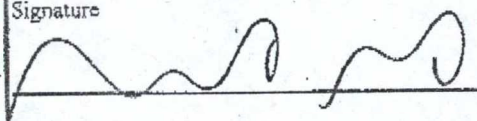
1. Name of Facility	Name of Owner Facility	2. EPA Identification Number (if already assigned under RCRA)
The Old Rainier Brewery	Rainier Commons LLC	WAD051239994

3. Facility Mailing Address (Street or PO Box, City, State, & Zip Code)	4. Location of Facility (No. Street, City, State, & Zip Code)
c/o Ariel Development 3317 3rd Ave S Seattle WA 98134	3100 Airport Way S. Seattle WA 98134

5. Installation Contact (Name and Title)	6. Type of PCB Activity (Mark 'X' in appropriate box. See Instructions.
Eitan Alon - Representative	[X] A. Generator w/onsite storage facility [ ] B. Storer (Commercial) [ ] C. Transporter [ ] D. R&D/Treatability [ ] E. Approved Disposer [ ] F. Scrap Metal Recovery Oven/Smelter, High Efficiency Boilers
Telephone Number (Area Code and Number) 206 898 8501	

7. Certification

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as a company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Signature	Name and Official Title (Type of Print)	Date Signed
	Eitan Alon - Representative	4/22/09

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